**EXHIBIT 99 to Declaration of Joel Israel** 



## ילקוט הפרסומים

1997 1832 11 45	520 ד באייר התשניז
עמדר חודעה של מינוי וערת משמעת לפי ואק המסיבולונים . 1946	עמור הירעד על קביעה הפקיר שר הפרע 3344 ב
הממכה לפי חוק מוכצת הפירות (ייצור ושיווק) ולפי חוק המוכנה: לעמור נוי (יהוא ושיווק) מסכנ	הודעה ביכר תנאי עבודה מיוחציים לפי ופק שיוות ב דמדינה נניטלאות) 1946
מינוי ממלא מקום נציג שר תביטי והשיבון במועצה הארצית לחבנון ולבניה	מרנוי ממלא מקום חמנוא הכללי של משוד המשפטים 1446 פ הורפה על נמר כחונתו של שופט
חרדנה ברבר קבינת תקנים	הסמבה בספטייות של רשם מקיקנין 1846
הורעה ברבר בקשות לויישום וכות משפחים של זני צמניים	· · · · · · · · · · · · · · · · · · ·
חורעת מוקרמה ברבר מחיקה מפנקס העמוחה 1400	החדונה על שינוי פקיד עומה 1995
הרדעה כדכר מחיקה; משנקס העמוחות	[2]
הרדעות מאת הכתם הרשמי Hiz	ת בדבר שכום התביעה בריון מהיו לשי תקנות בית דריו לעבודה לכיעת שכום התביעה בריון
רוחיה שנועיים של בנק ישראל על מחשר המטבע. פוש הידעה מאה העיבור	הדצה על פיטי חברים לועדיה פסיביאטריוה

מיפון הכרוח על התאחרות כלתי פותרת כ"ב בטבת החשת"ו (ו בינואר 1997) ל"14.900 שקלים לפי חקנות חהבנה ושכת ודירים), צופו בתקם שמכותי לפי חקנה המנוגה לחקנות וחיבות בתקם שמכותי לפי חקנה היותר הי U- 190 mm ר וביבו. שופט נפיא בית משפט מופדי מנחל בתי המשפט החדעה על מינוי הברים לוערות מסיכואשריות מוצייות לילרים ולנוער לפי חוק טיפול בחולי נמש, החשניא-1991 אני מחיית כי בחוקף ממכוחי לפי סניף אנא לחיק סישל כחלי נפת התפנים-1911, שינוזי לתמיים בתנרות מסינומריות מודרות לילדים ולעוד שמונכם יקבו מוזבר הערות. את העושים במסוים לחלך. כיש בניסן חוושכיו (4 כבשר ידירו) יונאק פרדכי שר הבשואן ציך שארו, הטקר 1, ענד ממה. רש האושמים, עמר 2000. מושן ירושלים ברשימה התפאים בכלי הואר מושחת במסיכיאטריה. של חילר הטתכמי וצרעה על פינוי פקוד שומה דד יוטף הטב רד אסחר ולילי לפי פקרות מס הכנסת אני מחדיע שבתתקה סמכותו לצוי סנים 12 לפקורת מס הכנסה', מיניהי את עובדת הדניבור שלמית הרשקי, היז פאוצפפות, לפקירת שישה בטשרי בקיר עושה אילה, ומאל ביום כיב בשכת התשניו (1 בינואר 1911). סשימו שברים מוניאליים אורית מוסל י בניםן התשניו מו באשריל זייו) סום מו-3 מוצו לשרכו ברשימה פסיבולונים בעלי תואר מומחר במסיבולוניה יצל רפנה ריני פפינות ישואל. נוסח חרש ג עמד פנו. ברשימת עוכרים סיציאליים ושדעה על מינוי משונה על הגכיה חיד רושפרגל לפי פקידת הססים (גביה) אני מחדיע שבטקש משכורו לפי שניף גוו) לשקדה המשים נברתו, משורות את עוברת הציבור שילשית הרשקו, אין אינגנאית, לשמונת על תנבית, הול ביום כ"ב בשבה התשקין (ו בינושי לופו). ברשיטת רופאים בעלי תושי טומונה בפטיביאטריה של רץ דינה קטליאר ברשיטה פסיבולונים בעלי הואר מוסחה בפסיבולוגיה. קליניה שראין מרוש חיקי איי, כוך כ עם אנוי סיה התשליב עם 44 צופיה סמוכה אבנר קוחלי וצדעה ברבר סכום התכיעה בדיון מחור ברפיזה פסיבולוגים מגלי היאר שמחה בפסיבולוגיה. היצוכית לפי חקנות בית היין לעבודה וקביעת סכום החביעה בייון מחירג והתפין-מיוו רחל קונל סיבאל ויילטי תמד מחלין פרום משה וכי נח תשפון וקבינת סכום תתבינה בוייון מחירת וסושין-ספו". אני קית החשיך שה 1444 החשנים שה 1442 יים החשנית. ' יים החשנית עם 1462 החשנים עם 1461 עם 1461. 3397 ילשט הפרסוסים שננג די באייר מחשנים, 1991 ב.11



## ילקוט הפרסומים

1990 פו בפברואר 1990	רנ כשבט התשניה
כמור וצישאו לכסוק בבישה רכב מעוצי 1818. הדינה בדבר משדר ביה משפט שבו משפלת העורבה	פסוד ורוכת על פינוי טען שר
2319	ועסייע צות של בנק ישראל 141
הודעה ביבי בחינות עורבי מענטים פונג הודעה ביבי פקיעון של אסיות נפט פונג	וברות לפי פקודת מעיבת סרור
דודינה כל מקיכה של היתר מוקדם להימושי נפט 1111 תורעה כל הצחיך בשיקים מותגבה 1111	אדעות על פיטי שופסים לכית פשפט לעניני משטחה . 1214 יטי מפלא סקוע למנות תכללי של משרך המשפטים   2218
הורעה על האורך בשיקום מותצבה	ינוי ידשב ראש וחבר למופנה להמוד תוצמורים בספרט פונג
הודעה על ביטול הסכפים קיבוניים מיוהיים שהתקבלו בשנת 1911 1182	יטי נציג שר הביער יהשיבון בוברת מוארית לאבבון ובציה
הורעה כרכר שיעור ריצית תחשב הכללי נגנו הורעה כרכר מתן רשיונות פודרים גגנו	ודינה על הסמכה לצי פקורת כדיאות וזעם פונג
חשרת מסור לפי מקורת הכשיחות בעבודה השורה בחורה בדבר הפקדה תכנית מיושר בותויה	יטי הכד לתנות הלתות לפי חוק הפסיבולונים 1314 יטי הפרים לתניות הפהיות לענין נמלח ניידות 1314
זמדעה כדבר השקדה הכנית מיוטער מוקויה באנד הצרעה כדבר מוע רשיוטה להציא לאטר עתונים בעד	ינוי כורכב מולנה וכייות מנופיים של אי צמויים 116
שיטי מנויל אינוינה מישה משמיה	ספכת לפי חוק אננת הנוסח
הדרעות ברבו רכישת שיקטות למרכי צייבור 1388	רנה על מינוי פקרי מפ רכוש כחכרי וערה לפי הפשך לעירוד מילוקם של גניינים בעלי חצה
בקפות לפידוק חברות על ידי בית המשפט 2005 הודעות לפי פקודת הענודות השירושיות	מחומת לובל דעות לפי זמק תפיקות פל הסטבה. בדבר -
חורינות פאת המינס חוישמי 2346	ושיקו חדיום לחברות כענין השקשות ריאליות
ווידה שבועי של בנק ישראל על מחזור המשבע נאנו	הבאו וחבות כמהו המשלה הבנוע ההל ואל
צורעות פועת הציבור נאנ	בחוץ לארץ יונג

### בילקוט הפושומים התשפיו. עם 1436. בילקוט הפרסומים החשפים, עם 1734. וכילקוט הפוטומים החשריי, עם 1886. ספרות המטשלה שתארנאיט הפפורטים לחלן הם ארגונים וצרעת על מינוי סגן שור מאדיצים בואת. על פי טעיף מתבאה לחוקיומור: שיריסטים בחירום חלק מאינון האמאנה הממשלה', כי בתנאמ לשניף זמטן לחוק האמרי. מינה מטלא מקום שר תחינוך, התרבות האפורט, בארשר ראש הממשלה את חבר הבנסת משה שלר למכן שר במשרר (ו) פלסטין אלמסלמה: (ג) קרן הרוותה השיתוה לפלסטין טאינטרפל) -Palestinian Rehal and Development Fund (INTERPAL) הדיטר, התיבות הושפרם הארצה על הצדער נמסרה לכנסת ביום א' בשבק בתשרות נונו בינואר אייונ נט פרן אלאפניה (בסרתועי של פון חשר משחו פלד פקנה ביום כיא בסבת (ב), תחונר לעשרה ושלידריות עם פלסטין – התשנ"ת פנו בינושר פיפון עם מסירוע של שד הדיצון. (Berafassance et de Solidarite Avec (As Palettine (CBSP) Le Conste de Burafassance et de Solidarite Avec .la Palestine (CBSP) ר בשבע התשניה (נ בפברהור 1996) (מ) קרן תשיפה הקודשה לרוותה ולפיועוו -(1-ST DOT) Hoty Land Foundation for Relief and Development ון נוח סוכיר הממשלח , פטו זאופניד מם זיני כיש בשבת התשכיח מון בינואר אפון ין מה יי רפסילה הודעה על פינויים לועדה חשייפצת ולמועצה המייעעת של בגק ישראל לפי וצק כנק ישראל, דתשייד-1981 מודינים מה, כי ביתאם לשפיפים שמט ריבטם לחוק בוק ישראל, התשיד-1991, מינחר הממשלה את דיקמד שריבה ואת אייון רף ליזות המדים משרה ממייצנה ממשלנה השיצבת של בנק ישראל ער יום עין באייר התשלוח (נו במאי 1994) מוצר שופס לברת משפט לעניני משפחה לפי חוק בית המשפע לעניני משפחה. התשנה.-פוויו בתוקה שמבותי לפי שניף ננכו לחיק בית המשפע כתיקה שטכותי לפי פניף גנה להיק כיה המשפט לעניי משפחה. התשניה-1901, ובהסכמת נשיא כיה המשפט העליון, אני מטנה את העושמת שיית עלו, תי 1900 איני שימשה של כית מיצש עולה, ליון בכית משפט לעניני משפחה, תחל כיום כיח בענת התשניה ענ ביטאר ר בשכם החשבית ונ בפברואר פווו) מום פוד-ג) תו ביח מדון מחשייר עוד נפון כיד בטבת התשניה (נו בינותר 1996) (חם 1996–13) הודעה על מינוי חבר לוערות שחרורים סיח החשורה עמר נאב לפי חוק מעונשין. המשליו-וופו בתוקה מסכודה לפי מעיף מעצו) לחוק העונשין. המשליז-מסו", אני מסנה את דיר לואים הטנהי, רוצא. לחבר תרות שהחדים במחת הדודם. מינוי שופס לבית משפט לעניני משפחת לפי הוק ביח המשפט לעניני משפחת החשכית-1995 דר בישבט התיפנית (ו במברואר 1996) לחם 101-13) כחיקם סמסחיר לפי שניף גובו לחיק כית המיפטי ליניתי משפחת, החשורה-1919, זכרסכמת נשיא בית המשפט חוקלים, אני מסנה את היפוסעת שיכה פית, תיז מאואונ. החשופטת תוג הרשייר, תיי נפניפאה פווסטת של בית משפט שלות, לחין בכית מיפט לינוי משפחה. החל ביום כיה בטבת תחשורת עצ בינהאי 1918 1213F WIR ' פיזו התשליו. עם פנג הברוח לפי מקורת פניכת טרור. התשיח-1440 (3-2000 WH) ברוקה ססכותה לפי סעיף a לפקורת מניעת טרוד. התש"ח-1996. ובעוסף להצראות שהצרעה עלידן פורסטה Alla LATEL שר המעשטים סיה התשוניה, עמר פונ. ילשט השיטופים 2014, כ"ל בשבט החשונית. 2014.01 2314



# ילקוט הפרסומים

		100011111111111111111111111111111111111
נפור	,	עמר
1990	צילח סמכריות לפי חרק־יסרה הממשלה	ויקון הברוד. על התאחרות בלחי מותרת לפי תקנות א
1991	ורעה ברבר חילופי סגן מפלא מקום ובחירת פגן ראש הפועצה המקומית נבעת ערה	התנגה (שעת תירום)
1971	ודעה על קיום בחינות מוער אביב 2002 של מוצנות רואי השבון	זינוי רערות שרעור לפי חוק משפחות היילים שנטפו ה במערכה (הגמולים ושיקום) ולפי חוק כתי דין
1592	ודעה על עיבור סטטיסטיקה	מינוזליים 1981 ה
1592	ודעות כדבר תשעיית חברים מלשכת עורכי תריון	ניטי חברה לושרות ערשר לפי החוקים האמורים 1841 ה
1543	ודעה ברכר פוער ומקום בחירה רב העיר תליאבינ-יפו	זינו ועדוה ערעיר לפי חוק הנכים (תנמולים ושיקום) ה ולפי חוק בתו דין מינהליים
1993	יקון שעות בהסמכה לפי חוק איסור חלבנת הון	מינוי תברה לועדות ערעוד לפי החוקים האמורים 1910
	ישול אברוד. על אאר נגוע במחלת הניזקסל ורשה בדבר רכישת קרקעות לצרכי עיבור	
1599	זרשת לפי חיק התכנק והבניה	
1423	ודעה לפי פקורת האנודות השיתופיות	
1430	ארעות נואת הטונס הרשמי צרעות נואת הציבור	מינוי חבר לוערות רפואות לענין גמלת ניידות 1840 התרכת על הארכת תוקף הסמכה לפי חוק המהגרסים
1654	חזות שבועיים של כנק ישראל	והאדריכלים 1990

### תיקון מכרזה על התאחרות כלתי מותרת לפי חקנות ההגנה (שעת חירום).

בתוקף סמכותי לפי תקנת שמוגב: לתקנות התנגה ושעת תירום, 1945. ילאחי שהשתבעתי כי הרבר דדש למודך הננה על ביטוצן המדינה. שלום הציכור והסדר הציכודי אני קובע כי בהכוזה על התאחרות בלתי מחתת", אחרי "אלכותלה אלאיסלאמיה" יבוא:

אנדרות הערקה באיוש ואנהרע השייבות לארגון התמאס, או חומכות בי ומחקות את התשתיה של התמאס. לרבות –

רערת הצרקה והחכר האן יונס (ילגצת וכאת אלרתמה תאן יונסי):

אנורת חמרכז האסלאטי (יאלטניטע אלאטלאמיי) רצועת עזה,

אטרת טוהר המירות האסלאמית ("נשעית אלצלאת אלאסלאמיה") רצועת עזה:

האנורה האסלאמית (־אלגימעיה אלאסלאמיה־) רצועת עות,

אנורת הנאמנות לטיפול בקשישים (ינימעית אלומאא לרעאית אל מסנין") רציעת עוד:

אנודה מוסר הצדקה והחסר לילדים (ינימעית מברת אלרומה ללאטפאלי) רצועה עזה:

אגורת כית הקוראן והסתה (ינימעית דאר אלכתאב ואלסנהין רצועת קוהו

אנורת בית חקיראן המבורך והמונה (ינימעית ראר אלקראן אלכרים ואלסגהי) רצועת עוה:

אנודת יהאסיר אלנורי (יכמעית אלנוד אלחיריתרי) רצועת עזה:

אנורת הצרקה האטלאמית חברון (יאלגימעיה אלחיריה אלאטלאמיד אלחלילי: ג

אגורת ופיפורטה ביריחי ו'ג'מעית אלאצלאה אלחירית":

האגורה לסיפול ביתומים בבית לחם וזנמעית רעאית אליחים בית לחסי),

אנורת הצרקה (הרפורמה) האסלאמית באלבייה ו'גימעית אלאצלאתי).

יערת הצרקה ברמאללה (ילנצת אלוכאת רמאללהי). אנודת אלקואן ואלטונה קלקליה (יכטעית אלקראן ואלסנה קלקליהי).

ועדה הצרקה טול כרם (לגינת אלוכאת טול ברכיז. אנודה הסולירריות לכרקת האטלאטית (יכמעית אלתראבן אלודריה אלאטלאביתיו שכטו ועדת הסיוע האסלאמית שכט (ילגינת אלאעיזיה

אלאסלאמית נאבלסי), רערת כספי הצרקה גינין וילונות אפואל אלוכאה

נגין־ג

ע"ד 1945, תוסי נ, עםי מפו.

1588

אנודה הצעירים המוסלמים (ינימעית אלשעבאן" אלמטלמין) הצרון:

וכן האנורות האלה שמרכזן בחויל:

הכנס העולמי לנוער אסלאמי (יאלנדוה אלעאלמיה לשכאב אסלאמיי)

קראליציח הצרקה (־אאחלאה אלחידי)

אגודת 'הסיוע האסלאפית העולפית (יאלהיא'ה אלחיריה אלאסלאפיה אלעאלפיהיו."

יינ באדר החשטיב (25 בפברואר 2003)

(3-1000 DA)

בניפון כן אליקזר שר הביטחרן

### מונול שופטו נוער

לפי תוק הנוער (שפיטה, ענישה ודרכי טיפול). התשליא-וזפו

בתוקף סמכותי לפי סעיף 1 לחזק הנוער נשפיטה, ענישה ודרכי טיפול, התשל"א-ונזיו'. ובהסכבה שה המשפטיט, אני מטיל על עורד נרשק, חלוז ננונאינג, שופט בית משפט שלום ודשם של כית משפט מחזרי. כברונה במעל כשופט של בית המשפט המחזרי ברישה, לשמש משופט נוצר עד יום ייז בכסלו התשט"ה (30 בנובנונר

כמו כן אני מטיל על רון שפירא. ה'ז 1484000, שופט נית משפט שלום ורשם של בית משפט מחחי. בכחונת בפועל כשופט של בית המשפט המחווי בוזיפה, לשטש שופט טער ער יום כיו באב התשפיר (וג באנוסט 2006)

כמו כן אני מטיל על רחמים צמח, תיז 2004.04, יעל יצחק כהן, תיז 2004.04, קופטי כית משפט שלום בכתונה בפועל כשופטים של בית המשפט המוצוד כחיפה, לשמש שופטי נוער עד יום טיז בארו זו התשפיב (22 בפברוא

> וד באדר התשסיב (זו בפברואר 2005) (חמ 600-13)

אתרן כרק נשיא כית המשפט חעליון סידו התשליא, עמד 144

### מתוי שופטי נוער

לפי חוק הנוער (שפיטד. ענישה ודרכי טיפול). התשליא-וזוו

בתוקף סמכותי לפי סעיף ג לחיק הנחצר (שפיטר, ענישה ודרכי סיטול, התשליא-וזזו", ובהסכטת שר המשפטים, אני מטיל על שופטי ביה נמשפט מחזר, השופט האין גדניורה, ח"ז 1948.255, ההשופטת שולפית וסרקרוג, ת"ז 1945-256, לבהן כשופטי נוער ער תום הקופת כותתם בערכאה זו.

> לי באדר התשסיב (11 בפברואר 2003) (חמ 666–6)

אחרן ברק

נשיא בית המשפט העליון

. שיח התשליא, עמי געו.

ילקוט הפרטומים 3056. כ"נ בארר התשס"ב. 2002.2.

ירים החשמרס, עמ 1330 החשניז. עמר לפנג: החשניה. עמר 4558: החשרס, עמר 4656.



## ילקוט הפרסומים

5158 וו בפברואר 2003 ט בארר א' התשפיג עמור עמוד רודעה על מינוי פוסקים ופואיים לפי תקנות הכיטיח הלאומי (קביעת דרנת נכות לנפגעי עבירר) .. בבב הידעה כדבר התפשרות מיעשר לכנפת הורעה על מינוו חברי ועדה רפואית לעררים לפי חקנות הביטוח הלאומי וכיטוח נכותו וקביעת הודעת על הארכת מיניי ממלא מקום לסנינור אדרוז נכות רפואית, מיטי ועדות לעררים העיבורי תארצי ...... 1442 1465 . והראות שתות) הודעה על מינוי סגן נשיא לפי חוק בהי המשפט . 1464 הורעה על טינוי פקיד גביה לפי חוק הכיטית 1463 הלאומי ...... מינוי שופטים לכית המשפט לעניני משפחה . 1443 הודעת על ביטול מינוי פקיד גביה לפי רחוק תיקון רתורעה על הרכב הוערה לכתידת שופטים . . 1462

הסמכת מסקרוים לפי חוק איסור נהינד ברכב

שינוי מפקח לפי ואק העבירור המיני:ליות

הודעה כרבר החצר תוקף זכות מעפחים

מינוי רערת ערד לארנונה ותמרה:

בחוף הים ...... . ......

1404

1444

1484 . .

דודעה על הקמת וערה להטלח עיצום כספי לפי

חוק איסור הלכנת הון

הודעה בדבר אישור גוף ציבורי לפי הקנות הביטוח

רורעה בדבר הרשאת טף להפנית מתגרבים לשירות

למטרה ציבורית או לאוסית

הלאומי ומתנדבים: ..... ... באו

הוערה מיום כיב כאב ההשסיב (וג ביולי 1001) ימיום כיו בכסלו החשסיג נו בדצמבר 2001)

תוקף תמינוי לשלושה חירשים. החל ביום ל בשבט התשסיג (נ בפברואר 2003)

ל בשבט החשבינ וג בפבריאר 2003

(המ 1907 בשרות

שר המטפנים

מישב ואש וערת הסניניויה הציבורית

### הודעה על מינוי סגן נשיא

לפי חוק כתי המשפט ונוסח משילבן, ההשם ד-1991

בהתאם לסעיף גז לחוק בחי המשפט נוסה משלבן התשמיד-1441, אני מוריע שבחוקף מסכיתי לפי מעיף א לחוק האסור וכהסבמת בית דמשפט העליין, מיניתי את רמאל כרמד היו 1818-1850 שופט של בית נשפט שלום לכנן נשיא של כחי משפט השחום במחוז ירושלים שיום ביט בשבט התשסינ וו בפרואר 1801 עד יום יכ בשבט התשסיו וג בינואר 2001)

כיד בשכם התשכינ וזנ בינואר נספנ)

(3-e0 mm)

מאיר שטרית

" סיח החשמיר עמי 195 החשניב עמי 46

### מינוי שופטים לבית המשפט לעניני משפחה

לפי חוכ ביה המשפט לעניני משפחה ההשניה פייו

בתוקה שמכותי לפי מעיף נובי לחיל בית "משמט לעניתי משפחה הרשנה (1444 יבהסכמת נשיא בית המשפט העליון אני ממנה בה את

> שאול מנחיים. ה'ז פונצגאנים אהור קכלן ח'ז מוניייבס

שופטים של בית משפט גלום לדון בבין ייוכין לעניני משפחת רחל כיום ל בשבט הרשם נינ בפ י-2005

כיר בשפט דתשם ג וונ ביניאר נספנו

(3-2000 DA)

מאיר שטריה.

סיח דהשניה עם ופו

### תיקון ההידעה על הרכב היערה לבחירת שופטים

לפי חיק כתי המשפט וניסח משידב. החשמ ר-אאו

בהתאם לסעיף 440 לחוק בתו המתפט (נוכח משולב) התשמוד-1944, אנו מחדע כי ההל בייף ז מככת התשסינ (נו ברצמכר 2001) רשתנה הרכב דועדר לבדירת שופטים"

סיח התאמרה עמי 194.

יים החשה א עמ :נפנ החשה ב עם פנאנ

### הכרוה

### לפי מקורת מניינת טרור התשית-1946

בתוקף ממכוחה לפי סעיף 2 לפקודת מניעת טרור. התשית-1948, ונוסף על ההכרוות שהודעה עלידן פורסמה הלקנור הפרוטמים ההששרו. עם 1844, התשטים על 1944. התשעיר עם 1952, התשנית, על 1822, התשטים, על 500 ועם 1872, מבריוה הממינלה כי חבר ראנשים כמשרם להלן הא ארגון טרוריסטר:

יערת המירשת" - לו נת אלתראת המוכרת גם בשמות:

ייעדת התורעה האיסלאמית' - ילננת על היועיה אל אטלאמיה:

יתנועת התיקון והצרק האיסלאמית: - ינימעיית אל אצלאח אלהיריה אל אסלאמיה:

עמותת יאלסנאבלי:

יהיה שמם אשר יהיה מזמן לומן לרבוה כל פלניו וכל זניף, פרכז ועד קבוצה, סיניה הא או מיסד

" כארר א' החשס"נ ופו בפכרואר נפננו

אוצרן לישנסקי

עיר החשית תום א עמ' ני

### הודעה בדבר התפטרות מועמר לכנסת השע עשרה

לפי חוק הבחירות לכנסת ,נוסח משילבן החשכ"ט-1444

בהתאם לסעיף 1887) לחוק הבחירות לבנהת (נוסת משולבן, התשוביט-1988). ממסות ביה הרדעה כי נתן שרנסקי, מרשימה ישראל בעליה, ההמטר ביום ד באר א התשוביל (6 במברואר 2005)

הודעתי מיים נ בארד אי החשטינ ול בסבריאר 2003) בדבר תוצאות הבחירית לבנסת השים עשרה תחוקן בתחאם

> ר בארר א החשפינ ול בפברואר 2001 יחם 10-13

מישאל חשין

שופט בית המשפט העליון יושב ראש וערת הבחירות המרכזית לכנסת השש עשרת

סית התשביט עם ופו יים החשס'ג, עמ' 1400

### הורעה על הארכת מינוי ממלא מקום לסניגור הציבורו הארצו

לפי חוק הפניגיריה הציבורית החשניו -1994

מוריעים בוה כי בחוקף ממכוחה לפי מעיפים ג וישא) לחוק המעינוריה הצינוריה בחשצי--1998 החליטה וערת הסניעוריה הציכורית. ביום לי כשבט החשסיג ון בפברואר ניסגן להאריך את מינויו של עורך רין דורי פינטר. כממלא מקים המניגור הציבורי הארצי וואת בתמשך להחלטות

סיח החשניו עמי

1482

ילקוט הפרסומים 1505. עד כארר א החשסינ, 2005 וו



# ילקוט הפרסומים

5294 ייכ באייר התשסיר 2004 במאי 3

עמוד	עמור
מינוי עוצי פקיד שוסה לפי פקודת מס רכנסה 100 הכרוה על התאמרות כלתי מותרת לפי חקנות הרגנה (שעת הירום)	הצועה על יציאה נש"א המדינה את גבולוח המדינה דעל שוכי 1765 הורעה כרבר הרכב המועצה לנגים לאומיים. שמורות
רורעה על כוונה למתן צו הרחבה לפי חוק הסכמים קיבוציים	טבע ואחרים לאונייים
מינוי ממותה על ענתי הגפט	הורעות לפי כללי השפיטה וסדרי העכורה של הוערת לבהירת שוסטים)
הודעה בדבר שיעורי פטיקת ריבית והצמורה	מיטי יושב ראש מותב נוסף ליעדת ערר לפי חוק הרשויות המקומיות וביוב) יחוק בתי דין מינהליים
הורעה כדבר שעבור של זכויות נפס 176 הורעה כרבר הפקרת תכנית מיתאר למחוז	הודעה על מינוי רשם לפי חיק בית המשמט לעניני משפחה
ירושלים ירושלים איזנג תודעות לפי זעק תתכנון יהבניה איזנג	פרקליטים לפי חיק סרר הדין הפלילי 2775 הידעה ברבד הרכב המועצה ררתית טירת הכרסל 2775
הורעות לפי חוק הירושה	הורעה על קביעת מיסר לצורך קבלת פטור תלקי מס על קצכה שסקבל אדם על פי תסבם לפתן
כקשות לפידוק חברות על ירי בית המשפט 1807. הודער מאת האפוטרופוס הכללי	עיוכין בריים מיוני בעיף דוו למקורת מיני פון נציב מה רבנסה לענין פעיף דוו למקורת מה הבנסה מיוני ביני מה בנסה מיוני ביני מיוני מיוני מיוני מיוני ביני מיוני מיוני מיוני מיוני מיוני ביני מיוני
הורעה מאת הכתס הרשמו	מינוי ממונה על הנכיה ופקיד נכיה לפי מקורת המסים וגביה) אינג

שינוי

הודעה על קביעת מוסד לעורך קבלת פטור חלקי ממס על קצבה שמקבל ארם על פו הסכם למתן עיזבון בחיום

### לבי פקורת מה דבנסה

בחיקף סמכורר, לפי שעיף אננו לפקורת מס תכנסה" ולהכן – הפקורה: אני קיבע את איניבודייםה בר אילן במיסד לענין פטוד יסכומי קצבה שמקבל ארם על פי הסכם עיונין בחיים

תוקף קביעה זו מיום די בטבת החשפיר נו בינואר 2004 עד יום וי בטבת ההשפיז נוג ברצכבר 2004, והיא פותנית בקים החנאים האלח

- הזכאות לקצבה תהיה לנותן העייכון בלבר, לכל ימי מיז ולא תוצבר בירושה.
- בי באות לפטור תחול אך ווק לאחר העברת הבעלות על הנסים (להלן – נכסי העיוכין בחיים) לידו אוניברסיטת בר אילן:
- וכ: כל ההכנסות הניבעות מנכסי העייבון בחיים ייותרו בבעלותה המלאה של אוניברסיטת בר אילן:
- (a) דפטור ירול כל עור נותן העיזכון בחיים יבההקיים רתנאים הקבועים בסעוף אנגן לפקורה
- (3) אניברסיטת בר אולן תנחל רטימה שתכלול את פרטו ניתני דעייבונית ובהם שם, כחובה ח"ה, פורט נכסי העיזכון בחייב שהועברו לדשוהה. רשימח זו תצורף מ"ר שנה לרוח העונתי המנש לפקור השיסה

כיר בניסן החשטיר ופו באפריל נכסנו נחמ אינו-בו

משינו-בו שר האצר דיני מדינת ישראל, נוכח חדש 4 עסי פנו סיה התשכח, "מ 44"

### מיניי סגן נציב מס הכנסה לענין סעיף 147

### לפי סקידת מכ הכנסה

בהוקח המכורי לפי סעימים ז וייונג למקורת מם הכנדד. מדילן הפקורה, אני בשנה את עובר אנף מב דכנהר ומיכוי מקרקעין: עקב אילו: ה: 137567676. למנן נעיב הם דכנבד לענין שעוף דגו לפקורת

> כ ר בניסן החשם ר ופו באפריל 2004 חם 16-41

> > 2776

בנימין נהניד: שד האוצר ביני מרנות ישראל נוסת חרש 4 כת 121

### מינוי ממונח על הגביח וסקיר גביח

לפי פקורה השסים יוכיה:

בחוקה המכוח: לפי סעוף גנו) לפקורה המכים ונברה). אני מתנה בעיריות יבנה את בעלי המטרוד שלהלן לממונה על רגבוה ודפקורי נביד למנון וביות ארונד בלהת

היהי אי ביך בי עמ 1161, כח החשהיו עם 146.

ילקוט הפרכומים 2244 : ב באייר ההעם ד. 2004

מינוי עוזר פקיר שימה

אר יגאיער

המושלת מכוח חוק ההסררים במשק המדינה התיקיני חקיקה

להשנת יערי החקציבו התשנינ-1992 יובייר חשלומי

פקיד נבית - סגן וממלא מקום היועץ המשפטי לעיריה

### לפי פקורת מס הננסר

בהוקף סמכוחו לפי סעימים ו 12: לפקידת מק הכנסה (להלן - הפקידה, אני ממגד אה עיברת אנף מס הכנסה ומיסוי מסרקעין, שמתה עניו ה 1 2160046

הבנטה ומיסוי מקרקעין, שמתה עניו ה.ז 201400. לשמש עוזר מקרקעין, שמתה עניו בנונו בנונג בנונגגגג לשמש עוזר מקוד שומה, לענין העיסית בנונגי בנונגגגג 2015, 2014

ביד בניסן החשכיר (פו באפריל 2004) (חמ ולי-3)

חובה המניעים לעיריית יבנה ממונה על הגביה - מנהלת הארנוני־

(3-16 mm)

סית התשנינ עבר פו

ביר בניסן החשטיר ופו באפריל 2004

נומן נתניה ער דאיצר בריני מדינת ישראל נוסח הרש 4 עמי 120 ... דיני מדינת ישראל נוסח הרש 4 עמי 120 ...

### הכרוה על התאחרות בלתי מיתרת לפי חקנות ההננה ושעת חירים: 1846

בתוקף ססבותי לפי חקנה 1941 לתקווה ההגנד (שעת חירום) 1948 (לדלך - התקנות: "לאראי מהשתפגנעת כי היבר דרוש לעורך הענה על כיטרין "מדינה שלים הציבור והשיר הציבורי אני מכריו ביה כי חבר כני אדם הציבור האינור לעופות האישר העבידה העביבה האינון המכונה יהאטור העישר העבידה ותידועה גם כשם "לנגת רעאית ללמראה אלשוביהי אי ינישית אלידאתה ללשראה אלערביהי אי בכל שם אחר עינונית או לידאתה ללמראה אלערביה אי בכל שם אחר קבוצה או פיעה של ארגון זה לורמות כל פלניו וכד בניא מרכז וער מבשמעותה בתפנות

ני בניסן החשטיר ווג במרס 2004

שאיל מים: (מר ביים) מאיל מים: רב עחון עם פוף עם פוף (מר ביים) עם פוף (מר

### הידעה על ביונה למהן צי הרחבה

לפי תוק הסבסים קיביציים השי ו-ינוו

בתוקף מסנותי לפי דעיף 24 לחים הקרמים קיבוציים. התשייו-1851 אני מודיע על פוונהי להם עו יסי בעיף 25 לואף האמור המרחב את הדולת ההסבם הקיבוצי הכלכי (2004/2004) שבין לשבת התיאום של הערעים הכלכליים לבין הסתדות העובדים הכבלית החדשה מיים ייא בשבע התשם ד (1 במרם 2004) ברבר תשדום היכפת יוקר

כיז בנימן דתשטיר (10 באמ"יל 200: וחת לנו-נ אדוד אולמרט שר דהעשור רמירו "דרנמוקר

שדר דחשייו עם נו



### רשומות

## ילקוט הפרסומים

5362 צ במברואר 2006 כיד בשבט התשטיה עמוד האדעה למעוניינים והזמנתם לפי חוק רישים שיכונים הדשה כרצר החלשת וערה חשרים לעניני שירות ציבוריים נוצראת שינום מצרעות וערת התיאום 1224 חביטחון חכללי חדרכי ייצונ מעוניינים בפנידם..... חודעה על שינוי בחיכב הטיעתי של חכנסת......... 1224 חיקון הודעה על אצילת סמכריות לפי חוק שירות חורעה כרבר שיעורי ריבית הוחשב הכללי הורעה על מיזוג חברות... חברוות על התאחרדיות בלתי מותרות לפי תקנות ושונה (שעת הירום)\_\_\_\_\_ ושרעות כדכר ודנגות לוחות זכויות במקרקנין....... 1236 הצדעה על מינוי קצין תנמולים לפי ואק משפואת הפדעות לפי הוק התכנון ותכניה... היילים שנספר במערכה נתנפולים רשיקום).... תודעה על פינרי פקיד גביה לפי פקודה מס הכנסה.... 1227 - בקשות לצירוק חברות על ירי בית המשפט חודשת על מינוי פקידי נביה ומינוי שמונים על חגביה לפי פקורת הססים נגבית חרדעות מאת הכונס הרשמר..... מינוי רשם חעוברים חסוציאליים וצדעות מאת הציבור מינוי סגנית שופט ראשי לפי זויק בית הדין לעבורה\_לגנו

(2) אוצרי פרט 44 להזדעה יכוא. הודעה ברבר החלטת וערת השרים לעניני שירות הביטחון הכללי

### לפי חוק שירות הביטחון הכללי, התשסיבי 2002

מודיעים בזה. כי בהתאם לסעיף זוכנא) לחוק שירות הביטרצו חבללי, התשס"ב-2002', החליטה וערת השרים לעניני שירות הביטתון הבללי, באישור ועדת הכוסת לעניני השירות. להסמיך את שירות הביטחון הכללי לקיים קשרי נומלין עם ניפים ציבוריים ועם גופי מודיעין וביסחון, לרבות זרים. ובבלל זה לקבל ולהעביד מידע.

הודעה על שינוי בהרכב הסיעתי של הכנסת

לפי חוק הבחירות לכנסת (נוסח משולב). התשכ"ם-1941

משולבי, התשכ"ס-1944', על שינוי בהרכב הסיצתי של הכנסת

שאישרה וערת הכנסה כיום כי בשבט התשטית (נו כינואר

.(2005). לפי סעיפים 18(2) ו־60 לחיק הכנסת, החשניד-1994.

(ו) סיעת יאגורת ישראל׳ אשר תמנה ג חברי כנסח: יעקב ליצמן מאיר פרוש ישראל אייכלה

(2) סיעת 'דגל התורה' אשר תמנה ג חברי כנסת: אברהם

מודיעים בות, לפי סעיף צנות להצק תבחירות לכנסת ונוסח

סיעת "הרות התורה והשבת אגורת ישראל - דגל

כ"ת בשבת התשסיה (+ בינואר 2005) (3-3234 200)

יסעיף וא' לתקנק הכנסת. כמפורט להלן:

התורור התפלנה לשתי שיעות:

ב' בשכם החשס"ה (נו בינואר 2005)

סית התשניר, עמי 140: התשטיר, עמי 206.

יים החשכיה עמי מיה החשמיט, עמי פויוו.

רביץ משה נפני

ס"ח תתשוב"ט. עבר נסו

(3-10 DIL)

רשראל מימון מזכיר הממשלה

" כית תחשטיב. עמי פרו

### לפי תקנות ההענה ושעח חירום). 1945

(3-675 DED

בתוקף סמכותי לפי חקנת 1941אבו לחקנות ההננה ושעת חירום). 1945 (להלן – התקנות) ולאוד שחשתבנינתי כי חדבר דודש לצורך הגנה על כיסוצן חמרינה. שלום הציבור והסדר הציבורי. אני מכריז בזה כי חבר כני ארם או הארגון הפכתה אנודת אלאחסאן, ש בכל שם אחר שיכתת כו ארגון זה, לדכות כל פלניו וכל סניף. מרכג ועד, קבוצה או סיעה של ארגון זה. הראושיות כלתי שיתרת כמשמעותה בתקנות.

הכרזה על התאחרות כלוני מותרת

ראש תחום פרט (44) ו־(ב) נגא - לענין היתר

אישי ליוצא צבאי

שאול מופו

שר הביטואו

כיו בכסלו התשטיה (ו בדצמבר 2004)

ר בטבת התשטיה (14 בדצמבר 2004)

(3-1000 230) שאול מומו שר הביטוצן

.855 719 .2 TOW .1945 TY '

### חכרות על התאחרות בלתי מותרת לפי תקנות ההגנה ושעת חירונה, 1946

בתרקף סמכותי לפי תקנה 184 אנו בם לתקנות החגנה (שעת חירום). 1445 (להלן - התקנות), ולאחר שחשתכנעתי כי חדבר ררוש לצורך הננה על כיסחון המדינה שלום הציבור וחסדר הציבורי. אני מכריז בזה כי חבר בני ארם או הארגון תמכונה 'אגורת אלדודא - רמאללה' בראשותה של בפאח קטש או כל ארם אשר יבוא במקומה, או ככל שם אחר שיכתת כו ארגון זה. לרבות כל פלגיו וכל פניף, מרכז, יער. קבוצה או סיעה של ארנון זה, הוא התאחרות כלתי מותרת כמשמעיתה בתקנות.

כ"ט בטבת התשט"ה (פו בינואר 2005)

(5-1000 2002 שאול מופו

שר הביטחת

ע"ר 1945, תוס ב. עמר 1945

### הודעה על מינוי קצין תגמולים

לפי הוק משפוצה ואילים שנספר במערכה (הגמולים ושיקום).

אני מודיע, כי בתוקף ספבותי לפי סעיף 4 לואק משפחות חיילים שנספי במערכה (תנמולים ושיקום), החש"י-1190. סיניתי את ענבל (פו) פיטל, ח"ו 1867ו212. לקציות תנמולים לעניז תחוב האמור.

המען: אגף השיקום. רח' דוד אלעור 18. הקריות חל אביב. תוקו המינוי מיום סי בחשון התשוסיה (14 באוקטובר

12004 טי בחשון התשסיה (14 באוקטיבר 2004)

(3-321 2011)

שאול בניפו שר הביטחון

י סדח התשיי, עמי 161

וו) אדרי פרט 443 להודעה יכוא:

רשבן נרוביו ריבליון

ידשב ראש הכנטת

מאבו ראש ענף איכחון א - לענין צורם אישיים בלבר: X23\*1 (X)43 ופרט במינחל גיום

תיכון הורעה על אצילת סמכויות לפי תוק שירות ביטחון ונוסח משולכן התשמיו - 1986

משולב. התשמיו-1986 (להלן - תוצק). אני מודיע כי אצלתי לנושאי תפקידים נוספים מסמבריותי לפי סעיפי החוק. כמפורט

להלן בתיקח להודעה על אצילת סמכריותי ולהלן - הדצרעה

בתוקף סמבוחי לפי כעיף 34 לואים שירות ביטחון ונוסח

' סיח התשמ"ו, עמ' 101.

1226

ילקום הפרטומים 1862. כיד בשבט התשסיה 2005.1.2

יים התשנית. עם נסג יעםר 1966: התשניט. עםר 1941 ועמר לפינ, החשים, עמי פולו: החשטיא, עמי צוגג.



### רשומות

# ילקוט הפרסומים

2005 טלוגולט 11	ר באב התשסיה
עמוד	עמור
הרעה על חוספת רופאים לרטיפת רופאי וערה רפואית. לפי תקנות נכי המלחמה בנאצים (תנרות רפואיות) 5006	הסטכה לפי פקודת הראיות
גרשאה לפי פסודת הפרוצרורה הפלילית (ערות) 1808	תפיסה מקרקעין בטעת וארום
מנוי מטתה למתעצה הרחית גן יכנה	שירות הציבוד (הגבלות לאוד פרישת)
זורעת ברבר העברת תכנית מיתאר ארצית	תיקון הכרוה על ותאחרות בלחי מותרת לפי תקנות
זורעה ברבר חצגת לוח זכריות במקרקעין 0106	ההגנה (שעת דירום)

### הסמכה

### לפי פכורת הראיות נוסת חדשל תחשלא וזיו

בתוקף סמכותי לפי סעיף פו(כאש) לפקודת הראיות נוסח תרטן החשלא וזפו', אני מסמיכה כל אחר מן העוברים במינהלה כמשמעותה כחוק יישום הכניה ההתנתקות, תתשט"ה-2005, ששמם מפורט לחלן, להודיר על פני תצהיד לענין הסעיף האפור. לצודך פילוי תפקירו.

מעורת זהות	הפקיר	טם ומשפחה
9254582	:on	אורי דינור
503-15-1-10	מנהל תחום	רור שדה
45688378	מנהל תחום	חיים לוי
5.2999.546	רכית	אברת אוד
57007943	רכות	בחיה אמגן
52249968	רכז	חן עשרא
34026167	רכית	מאיה אסולין
51049408	:51	נמרוד חפץ

ר באב חתשטיה (+ באונוסט 2005)

ציפו לבני שרה המשפטים

' ריני מדינת ישראל. נוסח חרש 11. עמי 114.

' סיח ההשטיה, עמי נגו (120).

### מינוי חשב ראש נוסף לוועדת ערעור

לפי חוק להסוד חפיפה מקיקעין בטעח דירום. החש"-1944 בתוקו סמבותי לפי סעיף 10 לחוק לחסדו תפיסח מקרקעין כשעת חירום. התש" - 1919, אני ממנה את עינת רביד, ח" ו ++++ודבס, שופטת של בית משפט שלום, ליושב ראש נוסף בוועדות הערעור לפי החוק האמוד.

ייב בחמח התשטיה (פו ביולי 2005)

ציםו לבני טרח המשפטים

י סיח תחסיי, עמי ו,

### מינוי יושב ראש לווערה למתן היונרים לפי חוק שירות הציבור והנבלות לאחר פריכה).

חתשבש פשפו בתוקף סמכותי לפי סעיפים זו וינו לחוק שירות הציבור

נתנכלות לאחר פרישה), החשכים-1964', אני ממנה את מרים מזרדץ, חדו לאנה שופטח בית משפט מחתי, ליושב ראש הוועדה לפותן היותרים לפי הואק האסור

> יה בתמה התשסיה (24 ביולי 2003) (3-180 2570)

ציכי לכני שרת המשפטים

י כית התשכיט, עמי 144.

3808

### תיקון הכרוה על התאחרות כלתי מותרת

### לפי חכנות תחננה (שעת חירום), 1945

בתוקף סמכותי לפי חקנה 10(1) לתקנות התננה (שעת חירום), 1006'. ולאחר שטוכנעתי כי הדכר דרוש לצורך הגנה על ביטוען המדינה. טלום הציבור והסדר הציבורי, אני קובע כי בחברוה על תתאחרות בלחי מותרתי, ברשימת "אנורות הצרקה באירש ואזח'ע השייכות לארנון התשאם, או תושכות בו ומחוכות את התשתית של החפאסי.

בסופה יבוא יוערת הצדקה בית פנאר (ילנינת אלוכאת EZAKAT COMMITTEE OF BEIT FAGAR . TWO BY

בינ בשבט חתשטיח (נ בפברואר 2005)

(3-1000 loh)

שאול מופו שר הביטתק

- , עד 1945, חתר ג, עמי 558.
- יים החשמים, עםר סננג, חחשניה, עמר לפננו החשנית, עמר אפאי התשים. עבר 1884 התשטיב, עבר 1884: התשטיג, עבר

### הורעה על הוספת רופאים לרשימת רופאי ועדה רפואות

לפי חקנות נבי המלחמה בנאצים נוצדה רפואית). ותת שט"ו -1954

אני מודיע כי בתוקף סמכותי לפי חקנה ז לתקנות נכי המלחמה בנאצים (תנדה רפואית), החשט"ו -1991', מיניחי חברים ניספים לוועדה הרפואית, כמפורש להלן:

דיר מאיר אלחלל, חיז גופוצפרס

ו"ר אוריאל הרספו, ח": 1896611

ו"ר אנט וואש. ח'ו 17651676

מינוייהם של ד'ר בלה מסשינג'. ד'ר שלמה וולשטיין וד'ר נתן כגך - בטלים.

מען נוסף לוועדה: רח יפו 254 ירוטלים.

כ"נ בחשון החשס"ה (ל בנובמבר 2004) (3-774 100)

בנימין נתנידנו

- שר האחנר ' קיח החשטיו. עם נפו: החשליכ עם ונ.

  - יים החשנית עמר 179. יים החשטיא, עמי 868.
  - יים החשט"א. עמר 868.
  - י יים חה שנית. עמר 189.

### דגישאה

### לפי פקורת הפרוצדורה תפלילית (ערות)

בתוכף סמבותי לפי סעיף ג לשכורת הפרוצויורה הפלילית (ערתו), אני מרשה את יוסוק קרוייצר, ח"ו ו-1466610 עובד יחידת הממונה על הביטחון במערכת הביטחון, לחקור חשד לביצוע עבירות פלילית כמפורט להלן. אם החליטה כך על פי הנחדל החעדה המשותפת או נציג הפרקליטות העומר מראשה:

' חוקי א"י, כוך א', עם' אנג

ילקוט הפרסומים 3426. ר באב התשסיה. 11.6.2005



### רשומות

# ילקוט הפרסומים

9 ביולי 2006 5550 י"ג בתמוז התשס"ו עמור עמוד הורעה על ביעור רשומות בבתי המשפט..... מינוי רשמת לעניני ירושה....... מינוי שופטי נוער ...... מינוי שופטי נוער הורעה על אישור שיבונים ציבוריים ביורעה על אישור שיבונים ציבוריים הכרזות על התאחרות כלתי מותרת...... הורעות ברבר רבישת קרקעות לצרכי ציבור...... 1111 מינוי ממלא מקום המנהל הכללי של משרר הורעה לפי חוק הצהרות מוות ...... הורעה ברבר מינוי מנהל שרה התעופה של הרשות.. 109 בקשות לפירוק חברות על ירי בית המשפט......... 4128 הורעה ברבר תוצאות הבחירות לראש הרשות הורעות לפי פקורת האגורות השיתופיות...... 4133 המקומית חורפיש ...... הורעות מאת הכונס הרשמי ...... ביטול הכרזה על אזורים נגועים במחלת הניוקסל ...... 4109 אורעות מאת הציבור \_\_\_\_\_ ביטול הכרוה על אזורים נגועים במחלת שפעת רין וחשבון שבועי של בנק ישראל ..... שבועי של בנק הורעה על עיבור סטטיסטיקה ..... תיקח טעות

### הברזה על התאחרות בלתי מותרת

לפי תקנות ההגנה (שעת חירום), 1945

בתוקף סמכותי לפי תקנה 84(1)(ב) לתקנות ההגנה (שעת חירום). 1945' (להלן – התקנות). ולאחר שהשתבנעתי כי הרבר דרוש לצורך הגנה על ביטחון המדינה, שלום הציבור והסדר הציכורי, אני מכריז כזה כי חבר בני ארם או הארגון המכונה "NABLUS ZAKAT COMMITTEE", אגורת הצרקה שכם", "לג'נה זכאה נבלוס" או ככל שם אחר שיכונה כו ארגון זה. לרכות כל פלגיו וכל סניף, מרכז, וער, קבוצה או סיעה של ארגון זה, הוא התאחרות כלתי מותרת כמשמעותה בתקנות.

המחזיק ברכוש ההתאחרות הכלתי מותרת האמורה נררש להוריע על כך לשר הביטחון. באמצעות ארנון איקן. סגן ככיר .02-5317434 או 22-5317506 לחשב הכללי במשרר האוצר, טלי

> י"ג כסיון התשס"ו (9 ביוני 2006) (3-1080 DIT)

שר הביטחון

עמיר פרץ

.855 ע"ר 1945, תוס' 2, עמר

### מינוי ממלא מקום המנהל הבללי של משרר

התיירות לפי חוק שירות המרינה (מינויים), התשי"ט-1959

בתוקף סמכותי לפי סעיף 12 לחוק שירות המרינה (מינויים), התשי"ט-1959, ולאחר התייעצות עם נציב שירות המדינה, אני מטיל על משה ריגל, המשנה למנהל הכללי של משרר התיירות, את מילוי תפקיר המנהל הכללי של משרר התיירות, מיום כ' בתמוז התשס"ו (28 ביוני 2006) ער יום די בתמוז התשס"ו (30 ביוני 2006) או ער שובו של אלי בהן, חמנהל הכללי, מחוץ לארץ, לפי המוקרם.

> כיט בסיון התשס"ו (25 ביוני 2006) (3-56 20円)

יצחק הרצוג שר התיירות

י ס״ח התשייט, עמ׳ 86.

### הורעה כרבר מינוי מנהל שרה תעופה של הרשות

לפי חוק רשות שרות התעופה, התשל"ז-1977

אני מוריע כזה כי בתוקף סמכותה לפי סעיף 22(ב) לחוק רשות שרות חתעופח, חתשליז-1977, מינתה מועצת רשות שרות התעותה, כיום י"א כאייר התשס"ו (9 במאי 2006) באישור שר התחכורה, ולאחר שהוכאה לפניה המלצת מנהל הרשות, את משה טלמור, למנהל של שרה התעופה רכ הוז.

ב־ו בסיון התשס"ו (22 ביוני 2006)

(3-190 カロ)

שאול צמח ממלא מקום יושב ראש מועצת רשות שרות התעופה

נתאשר. שאול מומז שר התחבורה

### הורעה כרכר תוצאות הכחירות לראש הרשות המקומית חורפיש

לפי חוק הרשויות המקומיות (בחירות). התשב"ה-1965

בהתאם לסעיף וז(א) לחוק הרשויות המקומיות (בחירות) התשב"ה-1965', כהתאם לסעיף וז(א) לחוק הרשויות המקומיות (בחירות), התשכ"ה-1965', ולסעיף ל(באו) לחוק הרשויות המקומיות (כחירת ראש הרשות וסגניו וכהונתם). התשליה-1975, נמסרת כזה הורעה על תוצאות הכחירות לראש הרשות המקומית חורפיש:

- א. לקראת הכחירות שקוימו כיום א' כתמוז התשס"ו (27 ביוני - (2006
  - אושרו הצעות המועמדים כלחלן:
    - חיר אריז רכאר
      - מרעי מופיר
  - המספר הכולל של הבוחרים שהצביעו
- 2,991 בתחום הרשות המקומית המספר הבולל של הקולות הבשרים 2,942
  - המספר הכולל של חקולות חפסולים
    - מספר הקולות הכשרים שניתנו לכל אחר מהמועמרים:

### הקולות

כאחחים	במספרים	שם המועמר
55.98	1,647	ח׳יר ארין רכאר
44.02	1,295	מרעי מופיר

שמו של המועמד שנבחר לראש הרשות: ח׳יר ארין רכאר

> ג' בתמוז התשס"ו (29 ביוני 2006) (3-2150 カロ)

דור נחום מנחל חבחירות

### ביטול הברזה על אזורים נגועים במחלת הניוקסל

לפי פקורת מחלות בעלי חיים [נוסח חדש], התשמ"ח-1985

בתוקף סמכותי לפי סעיף 18 לפקורת מחלות כעלי חיים [נוסח חדש], התשמ"ה-1985', אני מכטל את ההכרוה' על האזורים המפורטים להלן כאזורים נגועים במחלת הניוקסל:

- (1) מושב אליפלט.
- (2) כל מקום אחר הנמצא ברריוס של 3 קימ ממושב אליפלט.

כ׳ כתמוז התשס"ו (28 ביוני 2006)

(3-126 カロ)

משח חוומוביץ מנהל השירותים חווטרינריים

י ס״ח התשל״ז, עמ׳ 182.

ילקוט הפרסומים 5550, י"ג בתמוז התשס"ו, 9.7.2006

מועצת הרשות המקומית חורפיש

י סיח התשביה, עמי 248.

י סיח התשליה, עמ' 211.

<sup>&#</sup>x27; סיח התשמיה, עמי 84,

י"פ התשס"ו, עמ' 2027.



### רשומות

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2009 בספטמבר 14 5998

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	הודעה על מינוי חברים וממלאי מקומם לוועדת מחקר
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### הכרזה על התאחדות בלתי מותרת

לפי תקנות חהגנה (שעת חירום). 1945

בתוקף סמכותי לפי תקנה 84(1)(ב) לתקנות ההגנה (שעת חירום), 1945 (לחלן – התקנות), ולאחר שהשתכנעתי כי הרבר ררוש לצורך הגנה על ביטחון המרינה, שלום הציכור והסרר הציבורי, אני מבריז כזה כי חבר כני ארם או ההתאחרות המכונה 'אגורת הצעירות המוסלמיות' או 'התאחרות הנשים המוסלמיות׳ או 'התאחרות הצעירות המוסלמיות בעזה" או "אגורת הצעירות האסלאמיות" או "אגורת הנשים האסלאמיות" (להלן – ההתאחרות) או ככל שם אחר שתכונה בו התאחרות זו. לרכות כל פלגיה וכל סניף, מרכז, וער, קבוצה או סיעה של התאחרות זו, היא התאחרות כלתי מותרת כמשמעותה כתקנות

המחזיק ברכוש ההתאחרות הבלתי מותרת האמורה נררש להוריע על כך לשר הביטחון כאמצעות רפיק שמעון כן שושן בטלי 02-5428658 ובפקס׳ 02-5428658.

הרואה את עצמו נפגע על ירי הכרזה זו, יכול להגיש את השגותיו בכתב לפני, כאמצעות היועץ המשפטי למערכת הביטחון, כתוך 14 ימים מיום שבו הוכא חכרוה זו ליריעתו,

> ח' בארר התשס"ט (4 במרס 2009) (3-1080 PM)

אהור ברק שר הכיטחון

,855 עמר 1945, תוס׳ 2, עמר 1945 '

### הכרזה על התאחדות בלתי מותרת

לפי תקנות ההגנה (שעת חירום). 1945

בתוקף סמבותי לפי תקנה 84(1)(ב) לתקנות ההגנה (שעת חירום), 1945 (להלן – התקנות), ולאחר שהשתבנעתי כי הרבר ררוש לצורך הגנה על ביטחון חמדינה, שלום הציבור והסרר הציכורי, אני מכריו בזה כי חבר בני ארם או החתאחרות המכונה 'אגורת הצרקה האסלאמית כאלכירה' או 'אגורת THE ISLAMIC\* או באלבירה המוסלמית הצרקה אר "בימעייה CHARITABLE SOCIETY AL-BIREH אלחירייה אלאסלאמייה אל כירה' (להלן - ההתאחרות) או ככל שם אחר שתכונה כו התאחרות זו, לרכות כל פלגיה וכל סניף. מרכז, וער, קבוצה או סיעה של התאחרות זו, היא התאחרות כלתי מותרת כמשמעותה כתקנות.

המחזיק כרכוש ההתאחרות הבלתי מותרת האמורה נררש להודיע על כך לשר הביטחון באמצעות ארנון איקן, סגן כביר לחשב הבללי במשרד הארצר, טלי 62-5317454 או 5317434.

הרואה את עצמו נפגע על ירי הכרוה זו, יכול להגיש את השגותיו בכתב לפני, באמצעות חיועץ המשפטי למערכת הביטחון. כתוך 14 ימים מיום שכו חובאה הכרוה זו ליריעתו.

> כיב כאלול חתשסיח (22 כספטמבר 2008) (3-1080 カロ)

אחור כרק שר הביטחון

" ע"ר 1945, תוס' 2, עמר 855

### הכרזה על התאחדות בלתי מותרת

לפי תקנות ההגנה (שעת חירום), 1945

בתוקף סמכותי לפי תקנה 84(ו)(ב) לתקנות ההגנה (שעת חירום), 1945 (לחלן – התקנות), ולאחר שהשתבנעתי בי הרבר ררוש לצורך הגנה על ביטחון המרינה, שלום הציבור והסרר הציכורי, אני מכריז כזה כי חבר כני ארם או ההתאחרות המכונה "האחים המוסלמים כחכרוך או "האח"ס" (להלן ההתאחרות) או ככל שם אחר שתכונה כו התאחרות זו, לרכות בל פלגיה וכל סנית, מרכז, וער, סבוצה או סיעה של התאחרות זו, היא התאחרות כלתי מותרת במשמעותה כתקנות.

הרואה את עצמו נפגע על ידי הברוה זו, יכול להגיש את השגותיו ככתב לפני, כאמצעות היועץ המשפטי למערכת הכיטחון, כתוך 14 ימים מיום שכו הוכאה הכרזה זו ליריעתו.

> כ"ב באלול התשס"ח (22 בספטמבר 2008) (3-1080 カロ)

אהור כרק

ע"ר 1945, תוס' ג, עמר 855,

### הכרזה על התאחדות בלתי מותרת

לפי תקנות ההגנה (שעת חירום), 1945

בתוקף סמכותי לפי תקנה 84(1Xב) לתקנות ההגנה (שעת חירום), 1945' (להלן – התקנות), ולאחר שהשתבנעתי בי הרבר ררוש לצורך חגנה על כיטחון המרינה, שלום הציכור והסרר הציכורי, אני מכריז כזה כי חבר כני ארם או ההתאחרות המכונה 'אגורת הפורום התרכותי של נשות הגא'פ' או 'מוערון הפורום התרכותי של נשות הגאיפי או 'מנת'רא סקאפי" או 'מוערון האישה התרכותית' או 'מוערון הפורום התרבותי" או "אלמנת׳רא אלסקאפי" או "מנרת׳א אלמראא אלתיקאפה" (להלן – ההתאחרות) או בכל שם אחר שתכונה בו התאחרות זו. לרבות כל פלגיה וכל סניף, מרכז, וער, קבוצה או סיעה של התאחרות זו. היא התאחרות כלתי מותרת במשמעותה כתקנות

הרואה את עצמו נפגע על ירי הברוה זו. יכול להגיש את השגותיו כבתב לפני, כאמצעות היועץ המשפטי למערכת הכיטחון, כתוך 14 ימים מיום שכו הוכאה הכרזה זו ליריעתו,

ח" בארר התשסיט (4 במרס 2009)

(3-1080 カロ)

אהור ברכ שר הכיטחוו

שר הכיטחון

.855 ער 1945, תוס׳ 2. עמ׳ 1945 '

### הכרזה על התאחרות בלתי מותרת

לפי תקנות ההגנה (שעת חירום), 1945

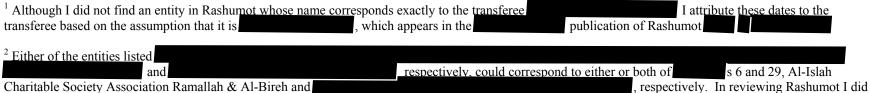
בתוקף סמבותי לפי תקנה 84(1)(ב) לתקנות ההגנה (שעת חירום), 1945' (להלן – התקנות), ולאחר שהשתבנעתי כי הרבר ררוש לצורך הגנה על כיטחון המרינה, שלום הציכור והסרר

ע"ר 1945, תוס' 2, עמר 1945, <sup>1</sup>

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 20 of 143 PageID #: 9581

### ANNEX D

No.	NAME	Address	DATE OF ISRAELI DECLARATION	DATE OF PUBLICATION IN RASHUMOT	DATE OF DECLARATION BY IDF GOVERNOR	DATE OF CONFISCATION
1	Al Mujamaa Al Islamy – Gaza אגודת המרכז האסלאמי ("אלמג'מע אלאסלאמי") רצועת עזה	Gaza, Israel	Unlawful Association: February 25, 2002	March 7, 2002 י.פ. 5058, תשס"ב (2) 1588	June 30, 2002	None
1						
62	Al-Islah Charitable Society Association Ramallah & Al-Bireh אגודת הצדקה (הרפורמה) האסלאמית באלבירה (ג'מעית אלאצלאח)	Ramoun Commercial Bldd Ramallah Al Bireh, West Bank	Unlawful Association: February 25, 2002	March 7, 2002 י.פ. 5058, תשס"ב (13) 1588 י.פ. 5058, תשס"ב	June 30, 2002	None

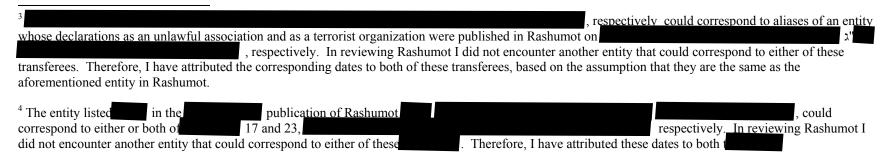


not encounter another entity that could correspond to either of these transferees. Since the aforementioned entities' dates of publication are identical, I have attributed these dates to the

No.	Name	ADDRESS	DATE OF ISRAELI DECLARATION	DATE OF PUBLICATION IN RASHUMOT	DATE OF DECLARATION BY IDF GOVERNOR	DATE OF CONFISCATION
		Tel. 022958216				

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 22 of 143 PageID #: 9583

						_	
No.	NAME	ADDRESS		DATE OF ISRAELI	DATE OF	DATE OF	DATE OF
				DECLARATION	PUBLICATION	DECLARATION	CONFISCATION
					IN RASHUMOT	BY <b>IDF</b>	
					111 211 20 22 011 0 2	GOVERNOR	
						GOVERNOR	
							-
18	Ornhalin Cara Sagiatu Bathlaham	B.O. Box 875	January 12 1000	Unlawful Association:	March 7, 2002	Juna 20, 2002	None
10	Orphelin Care Society Bethlehem האגודה לטיפול ביתומים בבית לחם	Bethlehem Al Saf	January 13, 1999	February 25, 2002	March 7, 2002 י.פ. 5058, תשס"ב	June 30, 2002	None
	האגרוה לטיפול ביתומים בבית לחם") ("ג'מעית רעאית אליתים בית לחם")	St Sai		1 cordary 23, 2002			
	(גמעית דעאית אליתים בית לחם )				(12) 1588		
		Bethlehem, Palestine					
		raiestine		1			



No.	NAME	Address	DATE OF ISRAELI DECLARATION	DATE OF PUBLICATION IN RASHUMOT	DATE OF DECLARATION BY IDF GOVERNOR	DATE OF CONFISCATION
27	Talkaran Zalat Campitta	D.O. Por 444	Lulan Cal Association	March 7, 2002	Luna 20, 2002	May 2, 2007
27	Tulkarem Zakat Committee ועדת הצדקה טול כרם ("לג'נת אלזכאת טול כרם")	B.O. Box 444 Toulkarem West Bank, Palestine	Unlawful Association: February 25, 2002	March 7, 2002 י.פ. 5058, תשס"ב (16) 1588	June 30, 2002	May 3, 2007  December 16, 2007

<sup>&</sup>lt;sup>5</sup> See note 3.

<sup>&</sup>lt;sup>6</sup> See note 4.

				_	_	_
No.	NAME	ADDRESS	DATE OF ISRAELI	DATE OF	DATE OF	DATE OF
			DECLARATION	PUBLICATION	DECLARATION	CONFISCATION
				IN RASHUMOT	BY IDF	
					GOVERNOR	
		Tel. 092673172				

<sup>&</sup>lt;sup>7</sup> See note 2.

## 

No.	Name	Address	DATE OF ISRAELI DECLARATION	DATE OF PUBLICATION IN RASHUMOT	DATE OF DECLARATION BY IDF GOVERNOR	DATE OF CONFISCATION
		Tel. 251939				

**EXHIBIT 100 to Declaration of Joel Israel** 

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 27 of 143 PageID #: 9588

From: Garrett, Steve (Comm Bkng E&W) < steve.garrett@rbs.co.uk>

**Sent:** Monday, June 6, 2005 3:56 AM

To: COLE, Guy, MLPU < Guy. COLE@rbs.com>

Subject: RE: KYC HIGH: HUMAN APPEAL INTERNATIONAL Aka Hay'at al-A'maalAl-Khayriyyah

Guy,

Agree. I have given go ahead to proceed with this additional account and will wait to hear from you.

Steve Garrett Manager, Risk

Commercial Banking UK

7th Floor, 280 Bishopsgate, London EC2M 4RB - Depot Code 028

① 020 7672 0840

ITS 8787 320840

steve.garrett@rbs.co.uk
Fax 020 7672 0204

abc

----Original Message-----

From: COLE, Guy, CBFM Enterprise Risk

Sent: Friday, June 03, 2005 4:58 PM

To: Garrett, Steve (Comm Bkng E&W)

Cc: WILLIAMSON, Ed, CBFM Enterprise Risk

Subject: RE: KYC HIGH: HUMAN APPEAL INTERNATIONAL Aka Hay'at al-A'maalAl-Khayriyyah

Steve

I would like to spend some further time investigating this charity. As this is an additional account, I see no reason for delaying the account opening.

After I have completed by analysis we should be in a better position to consider whether we should continue this relationship.

I can confirm that this is not the same charity as the one Retail exited at the New Year, that charity was called Friends of Al Aqsa.

Regards

Guy

**Guy Cole** 

CBFM Money Laundering Prevent Unit The Royal Bank of Scotland 135 Bishopsgate, London, EC2M 3UR

Tel. (020) 7085 5433 Internal 76572 365433 Fax. (020) 7085 4641 <<mailto:Guy.Cole@rbos.com>>

CBFM MLPU Website: <a href="http://cbfmweb.fm.rbsgrp.net/cbfmmlpu/">http://cbfmweb.fm.rbsgrp.net/cbfmmlpu/</a> (Answers to many frequently asked questions can be found on this website)

----Original Message----

From: Garrett, Steve (Comm Bkng E&W)

**Sent:** 02 June 2005 16:56

To: COLE, Guy, CBFM Enterprise Risk

Subject: FW: KYC HIGH: HUMAN APPEAL INTERNATIONAL Aka Hay'at al-A'maalAl-Khayriyyah

Guy,

Have you had a chance to look at this one yet?

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 28 of 143 PageID #: 9589

Steve Garrett Manager, Risk Commercial Banking UK = 7th Floor, 280 Bishopsgate, London EC2M 4RB - Depot Code 028 1 020 7672 0840 ITS 8787 320840 steve.garrett@rbs.co.uk Fax 020 7672 0204 abc -----Original Message-----From: WILLIAMSON, Ed, CBFM Enterprise Risk Sent: Thursday, May 26, 2005 3:16 PM To: COLE, Guy, CBFM Enterprise Risk; Garrett, Steve (Comm Bkng E&W) Subject: FW: KYC HIGH: HUMAN APPEAL INTERNATIONAL

Hi Steve,

Guy is out on business until next week but I think he should take a look at this one. This is a registered charity - reg no.1005733 - its steted purpose per the charity commission web-site is THE RELIEF OF POVERTY AND SICKNESS AND THE PROTECTION OF GOOD HEALTH AND THE ADVANCEMENT OF EDUCATION OF THOSE IN NEED OR FROM IMPOVERISHED COUNTRIES OVERSEAS AND IN PARTICULAR SUDAN, MAURITANIA, ETHIOPIA, LEBANON AND AFGHANISTAN

However, we have made the following NCIS disclosures on the key principals -



It looks as if we already bank them, so I'm not sure what the origin if this request is - additional account perhaps. Also I don't understand why a registered charity comes through as high risk. Doubtless, Guy will have the answers. In the meantime, if the RM contacts you please let him know that we are looking into it.

Thanks Ed

### Ed Williamson

**CBFM MLPU** 

Tel: (020) 70853473

Int: 363473

-----Original Message-----**From:** ~ KYC UID **Sent:** 26 May 2005 11:26

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 29 of 143 PageID #: 9590

To: MLPU UID

Subject: FW: KYC HIGH: HUMAN APPEAL INTERNATIONAL

Hi MLPU,

Please see matches below and advise.

thanks

### Sajik Thakor

KYC Team

CBFM Business and Credit Operations
The Royal Bank of Scotland Group
Level 5 Waterhouse Square
138-142 Holborn
London ECIN 7TH

### 02074278690

-----Original Message-----

From: Hudson, Andrew (CCB)
Sent: 25 May 2005 11:25
To: ~ KYC UID

Cc: Hudson, Andrew (CCB)

Subject: KYC HIGH: HUMAN APPEAL INTERNATIONAL

KYC - High Risk Customer: HUMAN APPEAL INTERNATIONAL

### RM Details

-----

RM Name : ANDREW FREDERICK HUDSON

RM RACF : RBS-GRP1\HUDSOAF Division : Corporate & Commercial

Location:

Email: andrew.f.hudson@rbs.co.uk

Contact : 0161 862 4172 ITS : 7 55 4172

### **Customer Details**

-----

Customer Name: HUMAN APPEAL INTERNATIONAL *[Thakor, Sajik]* Human Appeal International - 746764, 1387234 aka Hay'at al-A'maalAl-Khayriyyah

Trading Address: 11 VICTORIA COURT 376 WILMSLOW ROAD

MANCHESTER

M14 6AX [Thakor, Sajik] Exact - 746764, 1387234

CIN : Brand : A/c Secret Portfolio Cod

### KYC Details

-----

Legal Entity type : Charity

Additional Question

Trading Activity : Charitable activities
Country of Origin : United Kingdom
Overall KYC Risk : Medium

List of Key Principals

-----

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 30 of 143 PageID #: 9591

\*

Key Principal Name : AMJAD HAMZA [Thakor, Sajik] Hamza - 1175636 Amgad - 655522, 746764

Capacity : Finance Director

Country of Origin: Sudan \*\*\*\*\* CARE: Sanctions \*\*\*\*\*

Address:

5 ST HILDAS ROAD NORTHENDEN MANCHESTER

Post Code: M22 4FP

Date of Birth : 01/09/1967 [Thakor, Sajik] Exact - 655522, 746764

Last update : 25/05/2005 11:21:58

\*\*\*\*\*\*\*\*\*\*\*\*\*

Key Principal Name : KHALID AFEEF A K SHADEED [Thakor, Sajik] khalid Afeef - 746764

Capacity : Trustee Country of Origin : Israel

Address:

21 ADDISON CRESCENT

**MANCHESTER** 

Post Code:

M16 OWN [Thakor, Sajik] Exact - 746764

Date of Birth : 20/10/1959 [Thakor, Sajik] Exact - 746764

Last update : 25/05/2005 11:22:50

Last email sent:

The Royal Bank of Scotland plc. Registered in Scotland No 90312. Registered Office: 36 St Andrew Square, Edinburgh EH2 2YR

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## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 31 of 143 PageID #: 9592

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**EXHIBIT 101 to Declaration of Joel Israel** 

### Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 33 of 143 PageID #:

From: RODGER, Irvine, CBFM Regulatory Risk

**Sent:** Monday, June 21, 2004 8:02 AM

**To:** COLE, Guy, CBFM Regulatory Risk < Guy. COLE@rbos.com>; GREENFIELD, Katie,

CBFM Regulatory Risk <Katie.GREENFIELD@rbos.com>; JONES, Richard, CBFM Regulatory Risk <Richard.JONES@rbos.com>; SIMS, Claire, CBFM Regulatory Risk

<Claire.SIMS@rbos.com>

**Subject:** FW: Significant Case Commentary - Money Laundering - May 2004

**Attach:** May Sig Case Comm-Money Laundering.doc

Some more for us to look at.

Cheers

### Irvine Rodger

CBFM MLPU
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7334 1082
F (020) 7375 4641
E irvine.rodger@rbos.com>

-----Original Message-----**From:** O'Hear, Tony

**Sent:** 17 June 2004 14:52

To: Orr, James (Group Security & Fraud); Couzens, Michael; Trantum, Neil; Loudon, Murray; Stuart, Jane; Beighton, Jay; Coldicott, David; Hoseason, Michael (GFC); Kovacs, Susan; FOSTER, Stephen James, Group Risk Mgmt; SHAW, Peter, Group Risk Mgmt; RODGER, Irvine, CBFM Regulatory Risk; GREATBATCH, Alan, CBFM Regulatory Risk; JONES, Richard, CBFM Regulatory Risk; Richardson, Lesley; Brener, Alan (Retail Comp); Aitken, Phil; Clark, Graham (Retail Compliance); Earl, David; Sutherland, Graeme; Simons, Kevin (Internal Audit); Pyrke, Nick; Everett, Steve; Wharton, Sally; Gibson, Paul (Group Audit); Richardson, Peter (Op Risk); Sludden, Tom; Hemsley, Richard (Director, Ops Support & Development)

Cc: O'Neill, Patricia; Clinkscales, Arron; Brand, Derek; Brannigan, ChristineSubject: Significant Case Commentary - Money Laundering - May 2004

All,

<<...>>

If you any questions on the report please do not hesitate to give me a call.

Tony O'Hear Manager, Group Financial Crime 0131 523 3401 Ext 223401

If you would like to know more about Group Financial Crime, please access the Intranet link below. <a href="http://www.manufacturing.rbs.co.uk/gsf/GFC/default.asp">http://www.manufacturing.rbs.co.uk/gsf/GFC/default.asp</a>



Case Commentary - Money Laundering 

- Michael Couzens Strategic Intelligence Unit
  - Neil Trantum Group Financial Crime
- Jane Stuart Group Financial Crime
- Dave Coldicott Group Financial Crime
  - Susan Kovacs Group Internal Audit
- Graeme Sutherland Group Internal Audit
  - Kevin Simons Group Internal Audit Nick Pyrke - Group Internal Audit
- Stephen J Foster Group Enterprise Risk
  - Pete Richardson-Manufacturing Risk Management
- Richard Jones CBFM Compliance
- Tom Sludden Retail Direct Governance
  - Lesley Richardson Retail Compliance
    - Alan Brener Retail Compliance

- Full Report
- Richard Hemsley Group Security & Fraud Jim Orr - Group Financial Crime
- Murray Loudon Group Financial Crime
- Jay Beighton Group Financial Crime
- Mike Hoseason Group Financial Crime
  - David Earl Group Internal Audit
- Steven Everett Group Internal Audit
  - Sally Wharton Group Internal Audit Paul Gibson - Group Internal Audit
    - Peter Shaw Group Enterprise Risk
- Irvine Rodger CBFM Compliance
- Alan Greatbatch CBFM Compliance
- Phil Aitken Retail Compliance
- Graham Clark Retail Compliance

Redacted - Non-Responsive

1. Money Laundering Significant Cases (As determined by GS&F)

Key Details

May 2004

HIGHLY CONFIDENTIAL

- 2 -

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

-3-

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

Redacted - Non-Responsive

- 4 -

HIGHLY CONFIDENTIAL

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Case reference 746764 Connection maintained going back to 1990. Customers initially sent This payment was going to Jordan but we Branch sort code 01-08-94 pelleve that it was been intercepted by the Israeli government, as the beneficiary is Branch name NW, Manchester, UMIST thought to be "an unlawful association" with respect to terrorist activities. We also note Customer name Human Appeal International that our customer has previously sent funds to the Estimated amount laundered Unknown listed on an Israeli intelligence website as being linked with Hamas. The account has MLDU referral No - Established Profile been highlighted to Retail Compliance who will carry out a review of the account Reported by NW Retail conduct. In the meantime a report has been submitted to the Authorities for intelligence Disclosed Yes purposes.

May 2004 - 5 -

HIGHLY CONFIDENTIAL NW 196921

May 2004

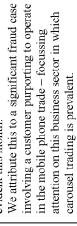
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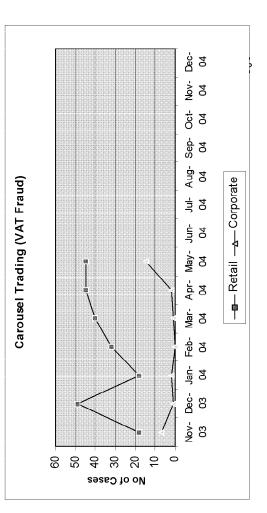
Carousel Trading (VAT Fraud) Cases

	Nov-03	Dec-03	Jan-04	Feb-(	)4 Mar	-04 A	or-04 /	May-04	Jun-04	Jul-04	Aug-0	1 Sep-04	1 Oct-04	Nov-03 Dec-03 Jan-04 Feb-04 Mar-04 Apr-04 May-04 Jun-04 Jul-04 Aug-04 Sep-04 Oct-04 Nov-04 Dec-04 Totals	Totals
Retail	18	49	18		32	40	45	45							247
Corporate	7		7	•	0	↔	N	15							28
Total	25	25 50	50 20		32	41	47	09	0	0		0	0 0		275

Recent months have evidenced an increasing trend in VAT Fraud Cases. This increase has, until this month, restricted itself to the Retail Business but an uplift in reports from Corporate is evident this month.

We attribute this to a significant fraud case



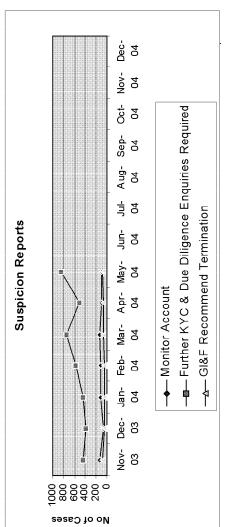


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Suspicion Reports	ports															
		Nov-03	Dec-03	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Nov-03 Dec-03 Jan-04 Feb-04 Mar-04 Apr-04 May-04 Jun-04 Jul-04 Aug-04 Sep-04 Oct-04 Nov-04 Dec-04 Totals	Oct-04	Nov-04	Dec-04	Totals
Monitor Account	ount	138	49	124	122	139	96	107								795
Further KYC & Due Diligence Enquiries Required	& Due quiries	449	393	437	578	750	501	841								3949
GI&F Recommend Termination	mend	87	56	51	56	99	76	84								476
	Total	674	516	612	756	955	675	1032	0	0	0	0	0	0	0	0 5220

The number of Money
Laundering Suspicion Reports
received by GFC in May is at an all time high. This indicates a greater awareness of money laundering issues, generally, across the business.

There is however evidence that 'unusual activity' is not being sufficiently challenged or researched prior to submission of a money laundering suspicion report to GFC. This issue will be discussed with the respective Compliance Functions.



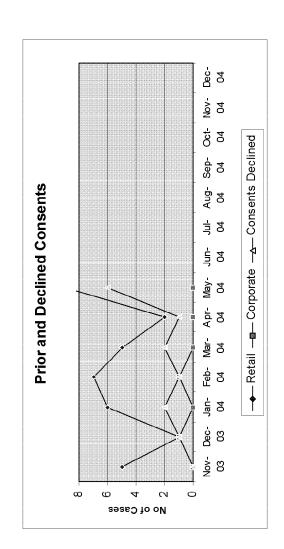
HIGHLY CONFIDENTIAL

Prior Consent Cases

	Nov-03	Nov-03 Dec-03 Jan-04 Feb-04 Mar-04 Apr-04 May-04 Jun-04 Jul-04 Aug-04 Sep-04 Oct-04 Nov-04 Dec-04 Totals	an-04 Fe	sb-04 Ma	r-04 Ap	r-04 Ma	ıy-04 Jun	-04 Ju	A 40-I∟	ug-04 S	ep-04 O	31-04 No	v-04 De	r-04 T	otals
Retail	IJ	-	9	7	IJ	7	6								35
Corporate	0	-	0	П	0	0	0								7
Total	വ	2	9	∞	מו	2	6	0	0	0	0	0	0	0	0 37
Consents Declined	0	-	~	П	0	<b>T</b>	9								13

The monies held which are subject to 'Restraint Orders' in connection with the 'consent declined' cases currently sits at £5,679,000.

The six 'consent declined' cases this month are all linked to cases where the funds are the direct result of fraud against the bank. The decision by law enforcement to decline consent in these cases is welcomed as it increases the likelihood of recovery in due course.

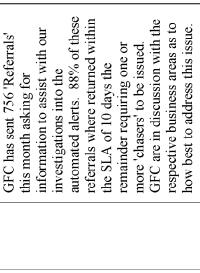


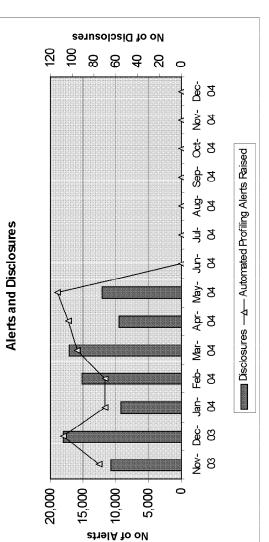
May 2004

8

Automated Profiling Alerts Raised

Totals 100,226	1,407	2,490	1,961	0 106,084	552
04 .		••	• •	0 1(	
v-04 Dec				0	
.t-04 №				0	
ep-04 0c				0	
ug-04 S				0	
40-li				0	
JN-04 JL				0	
Mar-04 Apr-04 May-04 Jun-04 Jul-04 Aug-04 Sep-04 Oct-04 Nov-04 Dec-04 Totals 14,923 16,550 17,520	233	719	259	18,731	26
lar-04 Apr-04 May-04 14,923 16,550 17,520	195	274	246	15,979 17,265 18,731	22
Mar-04 14,923	183	448	425	15,979	103
	217	285	23	11,741	91
Jan-04   10,921	168	213	422 176 410	12,616 18,040 11,712 11,741	52
Dec-03 .	227	360	176	18,040	108
Nov-03 Dec-03 Jan-04 Feb-04 11,819 17,277 10,921 11,216	184	191	422	12,616	65
NW / RBS	TPF & Virgin	Offshore / RBSI	Coutts	Total =	Disclosures





Success/Feedback

Success

Redacted - Non-Responsive

# Feedback/Intelligence

- The Scottish Crown Office highlighted that their current experience is that Solicitors Firms (small/medium) are one of the most likely conduits for Money Laundering Activity. û
- At least 2 Scottish banks have received approaches from Russians seeking to deposit tens of millions of US\$. Whilst some of the names might be easily recognised others may be less well known.

- 10 -

May 2004

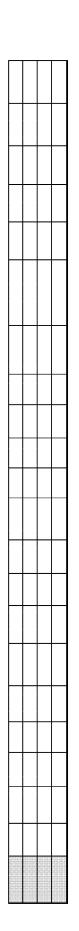
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Money Laundering	Money Laundering MI - Goalkeeper Extract								0462
						■ L			
ODEM		Total STR's	Disclosed %		Disclosed %	_	Disclosed %		
IMI COLINI	CIB	9 9		<b>9</b> 6	3 34.470	2		1 52	41 41 4.5
	Corporate/Commercial	13	11	18	17	<del></del>	0	27	
	PT&BS	13	13	18	17	15	15	o	8
Manufacturing	Structured Finance	0 583	249 86.2%	269	245 91.1%	239	228 95.4%	0 0	
	Account Management Ops	24		31		25		27	
	GFC	100	84	89	65	107	105	62	
	Payment Ops Lending Ops	0 1	16	0 41	0 47	20	0 0	0 0	nt 2
	MLDU	114	110	106	104	25	54	7.1	.72 96
	Telephony Ops	34	22	20	35	29		24	06
Retail		1923	1848 96.1%	2100	2040 97.1%	1784	1727 96.8%	1861	
	NatWest Private Banking	1 0 0 0	1	- C	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1,172	2 2	0 0	
	Nativest retail network RBS Private Banking	13/2	1521	1/30	2 2	0	0	0	ed (
	RBS Retail Network	342	321	329	314	292	284	314	301
	Retail Investment Services	7		18		17		13	
Retail Direct	Cards - Issuina	- 19 - 10	18 100.0%	30	30 30	33	30 90.9%	33 29	
	Cards - Streamline	6	6	11	11	7	9	18	16
	The One Account	1	1	2	2	11	11	2	7 0
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Total		2262	2142 94.7%	2453	2367 96.5%	2087	2014 96.5%	2193	2024 <mark>79</mark> 2.3%
May 2004					- 11 -				f 143 PageID #:

May 2004

Monthly	
Orders	tics
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- 13 -

- 14 -

# New Legal Orders & Customer Disclosure Authorities Referred to CSC's by GI&F

Month	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04
Birmingham	+	25	22	17	17	
Bolton NWB	16	22	22	18	21	
Bolton RBS	ത	15	2	12	16	
Bristol	10	7	25	28	28	
Chatham	24	23	35	32	40	
Edinburgh	4	-	11	9	10	
Enfield	23	24	32	31	32	
Farnborough	10	15	14	7	9	
Glasgow	13	13	16	15	20	
Leeds	20	18	23	17	18	
Leicester	o	21	37	28	40	
Liverpool	80	13	19	16	19	
London	11	9	_	0	0	
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Milton Keynes	17	12	16	8	ε	
N W Corporate	0	0	0	0	0	
Southampton	6	8	15	15	20	
Other / Central	09	83	72	33	29	

- 15 -

May 2004

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Resolved Date	28-May-04	28-May-04	20-May-04	28-May-04		
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Escalation Date	Apr-0	14-May-04	18-May-04	26-May-04		

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Date	Description of Documentation	A/C No	Sort Code	A/C Opened Date/Date of 1st Contact	Area Deali
Jun-03	Jun-03 A/C Opening Docs unavailable				
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Jun-03	Jun-03 A/C Opening Docs unavailable	T			
Jun-03	Jun-03 A/C Opening Docs unavailable				
Jul-03	Jul-03 A/C Opening Docs unavailable				
Jul-03	Jul-03 Copy of transfer doc requested				
Sep-03	Sep-03 Bankers Draft				
Sep-03	Sep-03 A/C Opening Docs unavailable	T			
Dec-03	Dec-03 A/C Opening Docs unavailable	T			
Jan-04	Jan-04 A/C Opening Docs unavailable		Pag	Podacted - Non-Posno	Pacno
Jan-04	Jan-04 A/C Opening Docs unavailable	T		- paran	odenii
Jan-04	Jan-04 A/C Opening Docs unavailable				
Jan-04	Jan-04 A/C Opening Docs unavailable				
Jan-04	Jan-04 Draft dated 6/12/02 for £26,655	T			
Feb-04	Feb-04 A/C Opening Docs unavailable				
Feb-04	Feb-04 A/C Opening Docs unavailable	ı			
May-04	May-04 A/C Opening Docs unavailable (loan)	T			
May-04	May-04 A/C Opening Docs unavailable	T			
May-04	May-04 A/C Opening Docs lost in transit between CSC & GFC				
		7			

4

May 2004

**EXHIBIT 102 to Declaration of Joel Israel** 

### DAVIES, Rob, Group Risk Mgmt

From:

DAVIES, Rob, Group Risk Mgmt

Sent:

20 May 2004 17:08

To:

FOSTER, Stephen James, Group Risk Mgmt; NORRIE, Ben, Group Risk Mgmt

Subject:

FW: INTERPAL

Another issue for us to consider with INTERPAL could be payment filtering. It may look a little inconsistent going forward if we have to block USD payments going to INTERPAL (i.e. INTERPAL is OFAC listed) but are happy to maintain a relationship with them as a customer.

----Original Message-----From:

FOSTER, Stephen James, Group Risk Mgmt

Sent:

20 May 2004 16:34

To:

COLE, Guy, CBFM Regulatory Risk; NORRIE, Ben, Group Risk Mgmt

Cc:

RODGER, Irvine, CBFM Regulatory Risk; DAVIES, Rob, Group Risk Mgmt; JONES, Richard, CBFM Regulatory Risk

Subject:

RE: INTERPAL

This is a very thorough appraisal of the position and I support the proposal, with one question - is semi-annual sufficient for the £ and Euro accounts?

Please send your views on Worldcheck. They have asked me to meet a potential customer and I intend to tell them how it has been and is, warts and all.

----Original Message-----

From:

COLE, Guy, CBFM Regulatory Risk

Sent:

20 May 2004 15:34

To:

FOSTER, Stephen James, Group Risk Mgmt; NORRIE, Ben, Group Risk Mgmt

Cc:

RODGER, Irvine, CBFM Regulatory Risk; DAVIES, Rob, Group Risk Mgmt; JONES, Richard, CBFM Regulatory Risk

Subject:

RE: INTERPAL

### Stephen/Ben

We have ascertained that the payment mentioned below has not gone to the Islamic Charitable Society for al-Agsa or Al-Agsa Islamic Charitable Society. Although similarly named, the recipient of this payment is a separate charity << http://www.icshebron.org/branches\_e.htm>>, which appears to be operating without any form of sanction placed on it.

From my trawls for information on the internet I have not found any information that substantiates beyond opinion that Interpal has made payments to terrorist groups. It appears the perspective taken by Israel towards Interpal and other charities operating/funding schools/orphanages/hostels in Palestine and Gaza, is that these charities perpetuate terrorism as terrorists know that if they die their dependents will be looked after by the charities. This charity is the predominant UK charity providing relief in this region, it hosted and funded a visit by British MPs to the region in 1998. Looking at the accounts there are also a large number of small (e.g. £2) direct debits being paid into the charity's account from UK donators, and so a change of their banking arrangements will probably result in some form of media commentary.

I attach a summary of my review of Interpal foreign payments in the last six months. All of the recipients of these payments were checked in Worldcheck, KYC Check and reviewed against available Google information << File: Doc1.doc >>

In consideration of the information in the document attached above. The background information for the Al-Islah charity, is a an unofficial opinion from an Israeli website and no other reports or recognition of this charity having is factually links to terrorism are recorded on any other websites. The Worldcheck information on incorrect, they state that the US Federal government and UN have acknowledged that the charity aids and abets terrorism. According to the KYC Check no sanctions have existed against this entity. The source of Worldcheck's information is a student's journal at the University of California. My recent experience of Worldcheck has been disappointing, I will probably write a separate email concerning my Worldcheck findings, but in this instance if your search for the ' against the WorldCheck 'part match' feature, no matches are found, if you then search for an 'exact match' one result is found.

I am content to leave the Sterling and Euro accounts operating with a semi annual review taking place for foreign payments made from the accounts. Consideration will need to be given regarding the operation of the US Dollar account, as funds from this account will get frozen if they are transferred via a US domiciled/owned counterparty. We should also be alert to any new Charity names being added to the Bank of England's terrorism list. I believe Interpal is aware of the sensitivity of their position, and will be keen to ensure it does not breach Bank of England sanctions.

I'll assume you are happy with approach, unless I hear otherwise.

Regards

Guy

**Guy Cole CBFM Money Laundering Prevent Unit** The Royal Bank of Scotland 135 Bishopsgate, London, EC2M 3UR T (020) 7375 5433 F (020) 7375 4641 <<mailto:Guy.Cole@rbos.com>>

----Original Message----

From: FOSTER, Stephen James, Group Risk Mgmt

Sent: 17 May 2004 11:24

COLE, Guy, CBFM Regulatory Risk; NORRIE, Ben, Group Risk Mgmt To: RODGER, Irvine, CBFM Regulatory Risk; DAVIES, Rob, Group Risk Mgmt

Subject: RE: INTERPAL

Guy, Ben is away all week, so I am replying on this.

You are correct that filtering is a group wide issue and that is why we have been working with key stakeholders like Payment Operations to develop the policy and capability. This continues and we know that it is a very important element of our counter -terrorism efforts.

On the specific case of Interpal, I can understand the difficulties of filtering payments in the absence of an automated system. However, we do need to monitor account activity and I hope that the RM and MLPU can find a practical way to review the account movements periodically for odd items. You are right to highlight the reputational issues but if management decides they don't want the relationship, there are ways to exit that might not cause a problem.

Please keep us in the loop with your investigations on the payments.

----Original Message----

COLE, Guy, CBFM Regulatory Risk From:

17 May 2004 11:05 To: NORRIE, Ben, Group Risk Mamt

Cc: FOSTER, Stephen James, Group Risk Mgmt; RODGER, Irvine, CBFM Regulatory Risk

Subject:

RE: INTERPAL

Ben

I understand the best people to speak to are either Shirley Ritson on 020 7672 6940 or Sarah Wallis on 020 7672 5826. Redacted - Privileged

Redacted - Privileged

I realise due to the US terrorist designation of Interpal, that we should be wary of the payments from their accounts with us, but in reality I believe there is very little we can effectively do to prevent payments being made without a payment filtering system, as the customer can initiate payments themselves without needing to contact the RM.

I have not been directly involved with the Interpal issue until your recent correspondence and so have not considered previously the risks myself. I think any decision to keep/close the account must be carefully made, as closing the account without an identifiable reason will most probably result in adverse media attention, also if a terrorism related payment is identified as being made, we again would suffer untoward regulatory/ media attention. I spent Friday looking through the last six months of debits on Interpal accounts, I have seen a couple of payments that warranted further investigation, particularly the below:

Transaction Date: Transaction Amount:

Transaction Type: Transaction References

Further system investigation has shown the recipient accounts details are the below EBANKG004373632

Bene acct name:
Bene acct nmbr:
Bene bank:

I need to conduct further investigations to establish whether this account could be the Islamic Charitable Society for al-Aqsa or Al-Aqsa Islamic Charitable Society. as this entity has been designated a terrorist group by the Bank of England.

### Regards

Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<<<mailto:Guy.Cole@rbos.com>>>

----Original Message----

From: NORRIE, Ben, Group Risk Mgmt

Sent: 14 May 2004 10:03

To: COLE, Guy, CBFM Regulatory Risk

Cc: FOSTER, Stephen James, Group Risk Mgmt

Subject: RE: INTERPAL

Do you have any contact in the Core Data Manager team that I could try? Is there ariy kind of agreement between CBFM and Manufacturing that would serve as a mandate to have this work performed on an on-going basis?

Im and not sure whether you were aware but until a few weeks ago the NatWest logo was used prominently on the Interpal website in soliciting donations. Did you or the RM have Interpal remove this? Are the CBFM MLPU happy with the potential risks in continuing this relationship?

### Ben

----Original Message----

From: COLE, Guy, CBFM Regulatory Risk

**Sent:** 06 May 2004 16:51

To: NORRIE, Ben, Group Risk Mgmt

Subject: RE: INTERPAL

Ben

The Relationship Manager is aware of the potential terrorism connections with this account and liased with Derek Brand during the account freeze. Although diligent in their interaction with the customer, the RM has no ability to filter or efficiently monitor payments, I understand that this could be done in the Core Data Manager team in Manufacturing who control payment blocking and restrictions.

### Regards

Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<<<mailto:Guy.Cole@rbos.com>>>

---Original Message-----

From: NORRIE, Ben, Group Risk Mgmt

Sent: 06 May 2004 15:55

To: COLE, Guy, CBFM Regulatory Risk

Subject: FW: INTERPAL

Guy,

3

Haven't heard back from you on the below?

Ben.

----Original Message----

From:

NORRIE, Ben, Group Risk Mgrnt

Sent:

21 April 2004 17:05

To:

COLE, Guy, CBFM Regulatory Risk; Derham, Bill (Cards Risk); Sludden, Tom

Cc:

DAVIES, Rob, Group Risk Mgnnt

Subject: INTERPAL

Gentlemen,

You may remember we have previously reported to the Bank of England against INTERPAL and its various aka's (including Education Aid for Palestine, Palestinians Relief & Development Fund, etc). There was an investigation by the Charities Commission and Special Branch in to potential links with Hamas, no action was taken against the charity. At this time we attempted to confirm with the Bank of England that

undertook to monitor the transactions going forward. Can I ask you to investigate whether any enhanced due diligence has been put in place over these accounts (not sure the above was communicated, therefore suspect not) and if not take steps to ensure that measures are put in place. I have some details of the accounts and cards should you require. Please contact me if any of the above is not clear.

Kind Regards, Ben Norrie

Group Risk Management Royal Bank of Scotland Group 5th Floor, 280 Bishopsgate London EC2M 4RB

Tel: 00 44 (0) 20 7334 1460 Fax: 00 44 (0) 20 7375 4813 Email: ben.norrie@rbos.com **EXHIBIT 103 to Declaration of Joel Israel** 

Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 57 of 143 PageID #:

TRANSMISSION VERIFICATION REPORT

TIME : NAME : FAX : TEL : 15/05/2003 11:13 NWB GREATER LDN EAST 01708-733816

DATE, TIME FAX NO. / NAME DURATION PAGE(S) RESULT

15/05 11:12 CITY IBC 00:00:40 05 OK STANDARD ECM

**NatWest** 

**Commercial Banking** 

Greater London East Commercial Banking Centre

P.O.Box 2401

1st Floor, 10 South Street

Romford

Essex, RM1 1BD

Tel:

01708 774529

Fax:

01708 733816

E-mail: terry.woodley@rbs.co.uk

Fax No:

Company:

To:

Phone No:

From:

Terry Woodley Assistant Manager

David Humphries

Date:

15 May 03

No of Pages

(including header):

5

BC

Subject

INTERPAL

\*\*\*\*\*URGENT\*\*\*\*

Please call us if this fax transmission is incomplete or illegible.

This message is confidential and for use by the addresses only. The contents are not to be disclosed to anyone other any error in transmission.

Please find attached a complaint letter from my customer.

I should be grateful if you would give the matter your urgent attention as the customer is in our Top 5 fee earners for the bank.

Please let me know your findings.

If you have any queries please let me know.

Kind regards

Terry Woodley

Assistant Manager

Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 58 of 143 PageID #:



### **Commercial Banking**

David Humphries

Company:

To:

IBC

**Greater London East Commercial Banking Centre** 

P.O.Box 2401

1st Floor, 10 South Street

Romford

Essex, RM1 1BD

01708 774529 Tel:

01708 733816

Fax: E-mail: terry.woodley@rbs.co.uk

Fax No:

Phone No:

Terry Woodley Assistant Manager

From: Date:

15 May 03

5

No of Pages

(including header):

Subject

INTERPAL

\*\*\*\*\*URGENT\*\*\*\*

Please call us if this fax transmission is incomplete or illegible.

This message is confidential and for use by the addressee only. The contents are not to be disclosed to anyone other than the addressee. Please advise the sender immediately by telephone of any error in transmission.

Please find attached a complaint letter from my customer.

I should be grateful if you would give the matter your urgent attention as the customer is in our Top 5 fee earners for the bank.

Please let me know your findings.

If you have any queries please let me know.

Kind regards

Terry Woodley Assistant Manager

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Agency agreements exist between members of The Royal Bank of Scotland Group.



PO Box 3333, London, NW6 1RW
Tel: 020 8450 8002 • Fax: 020 8450 8004
E-mail: info@interpal.org
Website: www.interpal.org
Registered Charity No. 1040094

BELINDA LANE
NATWEST BANK PLC, CORPORATE & COMMERCIAL BANKING
GREATER LONDON EAST, COMMERCIAL BANKING CENTRE
P O BOX 2401, 1<sup>ST</sup> FLOOR
10 SOUTH STREET
ROMFORD, ESSEX
RM1 1BD
FAX NO: 01708-733 816

Our Ref: (8996) Date: 13 May 2003

### FIRST VIEW BY FAX

Dear Belinda,

### Query

I hope you and Terry are well. I write on 2 matters which are of concern as follows:

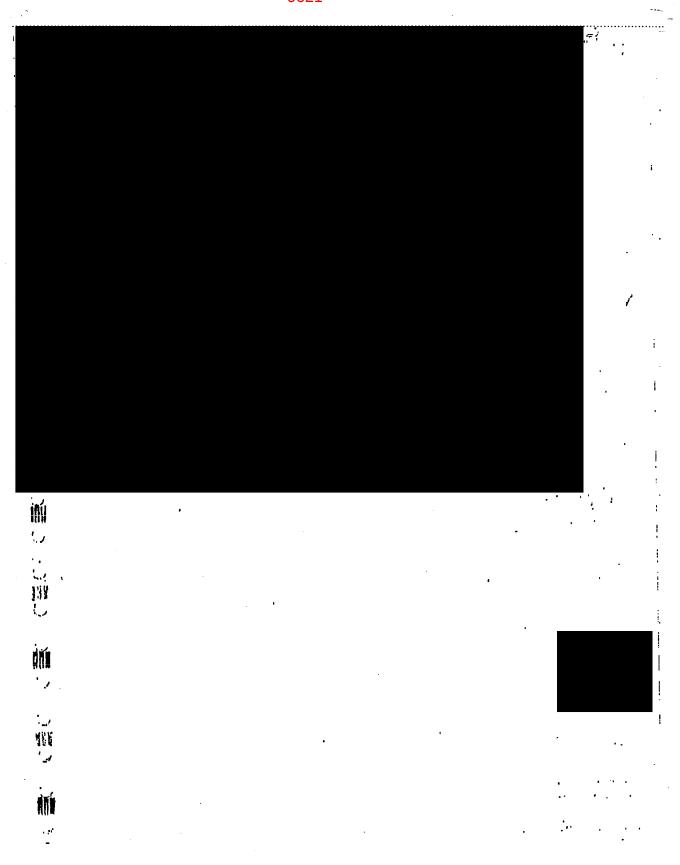
- 1) We have been receiving funds from our partners in Lebanon into our Itilaf Al-Khayr Account (No: 140-00-8537933) on a weekly basis for a few months now at least. However, the last transaction was returned by NatWest to the sender citing the reason that no such account exists (please see copy S.W.F.I.T. message attached). I should be grateful if you could look into why the funds were returned. We shall continue to receive funds into this account, and it would be helpful if such an error does not occur again.
- (see copy of transfer document attached). However, they never received the funds. Instead, another organisation we transferred funds to received twice the amount we sent. I spoke to David Humphries at the IBC in February, and he said the matter would be investigated. I was given the reference 078017FEB03. It is nearly mid-May now, and we are no nearer to discovering the outcome of the investigation. I should be grateful if you could follow it up and let me know what has happened.

Thank you for your kind attention and full co-operation.

Yours sincerely;

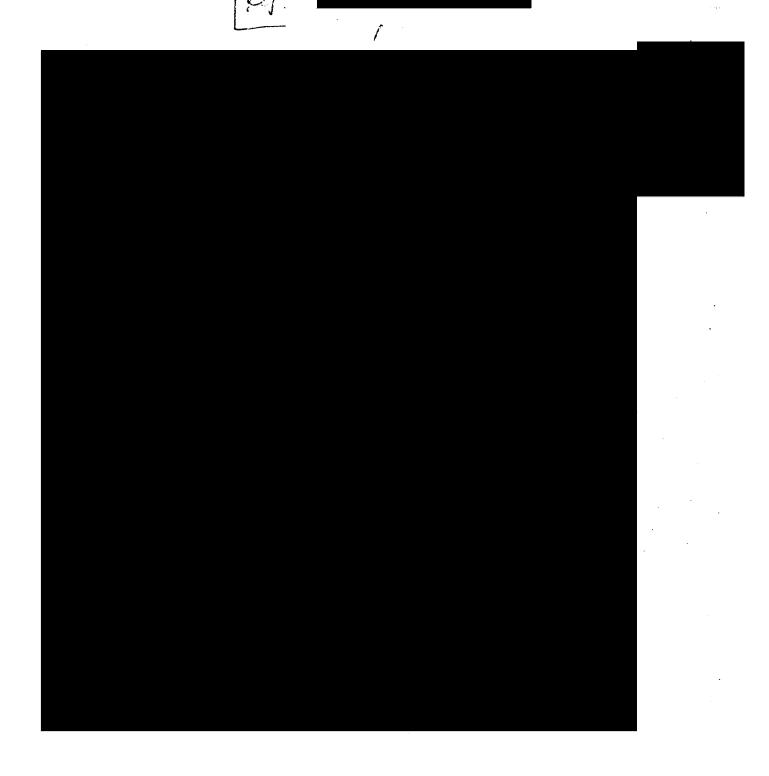
J. Qundil

Secretary to the Trustees



Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 61 of 143 PageID #:





This notification is not confirmation of receipt of the funds by the beneficiary - the Bank does not accept any liability whatsoever for any loss or damage arising in any way from any use of or reliance placed on the information.

Sheet 11 of 31

National Westminster Bank plc, Registered in England No 929027, Registered Office: 135 Bishopsgate, London EC2M 3UR

Regulated by the Financial Services Authority.

**NatWest Bank PLC** 

Agency agreements exist between members of The Royal Bank of Scotland Group.

Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 62 of 143 PageID #:



NWB 1355 (3/2002)



Sending a Payment Abroad
Please use your mouse, cursor or tab key to navigate. To obtain help click on the required section and press key 'F1', or refer to the form completion guide.

National Westminster Bank Plc Registered in England No 929027 Registered Office: 135 Bishopsgate, London EC2M 3UR.

HIGHLY CONFIDENTIAL NW 068310

### **Fax**

To: Terry Woodley, Assistant Manager

Company: Greater London East Commercial Banking Centre

Fax No: 01708 733816 Tel No: 01708 774529

From: Mike Preston

Customer Service Manager Complaint file C148.03

Date: 1st January 2003

Pages: 1

Re: Interpal - 140-00-08537933

Payment for \$4,946.00 dated 17th April 2003 - Our ref IBCSE2I01550815

Please call us if this fax transmission is incomplete or illegible.

This message is confidential and for use by the addressee only. The contents are not to be disclosed to anyone other than the addressee. Please advise the sender immediately by telephone of any error in transmission.

Dear Terry

I am sorry that your customer, Interpal, was dissatisfied with the level of service they received from us in respect of the above-mentioned returned payment. Thank you for letting me know their concerns and giving me this opportunity to address them.

I am currently researching the complaint in order that I can respond fully. I will contact you again within two weeks to provide an update/response.

For your information, our complaint file reference is C148.03.

Please be assured that I am committed to resolving the complaint and will ensure it is dealt with as quickly and effectively as possible.

Yours sincerely

Mike Preston
Customer Service Manager

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Regulated by the Financial Services Authority

Payment & Trade Operations

+44 161 829 1390

+44 161 829 1719

Payments Centre

PO Box No. 359 Lowry House

17 Marble Street

Manchester M60 2QP

Telephone:

Facsimile:

Agency agreements exist between members of the Royal Bank of Scotland Group

\*\* TOTAL PAGE.01 \*\*

**EXHIBIT 104 to Declaration of Joel Israel** 

### 

9626

From: PIGGORA on behalf of Piggott, Rachael Sent: Wednesday, February 26, 2003 10:44:01 AM

To: Lane, Belinda

CC: Woodley, Terry (CCB)

Subject: RE: Interpal

### Thanks Belinda.

And yes please to the RMP for background info and any transmission figures you may have too, then I might be able to do some costs analysis.

### Rachael

----Original Message----From: Lane, Belinda

Sent: 26 February 2003 15:22
To: Piggott, Rachael
Subject: RE: Interpal

Thanks Rachael - if Terry didn't tell you these custs are my top income earners - £9kpm! Let Terry know if you requrie a copy of his recent RMP which has all background info - Mr Qundil is really nice but I have been pressing him to take forward Bankline for about 2 years and he is always telling me he needs to refer to the board. I think we need to press him now!

----Original Message-----From: Piggott, Rachael

**Sent:** 26 February 2003 15:15

To: Lane, Belinda; Woodley, Terry (CCB)

Subject: Interpal

Dear Belinda & Terry,

The meeting with Interpal has been moved to 19/3/03 from today - I have got a stinking cold & didn't really to pass it onto Mr Qundil!

Just thought I would let you know.

Rachael

# Rachael Piggott Business Development Manager Cash Management Solutions

Mobile: 07900 137318

E-mail - rachael.piggott@rbs.co.uk

jkl abc

**EXHIBIT 105 to Declaration of Joel Israel** 



Your ref

The Manager NatWest Bank PLC Cricklewood Branch

24 September 2003

**Commercial Banking** 

London East & West Essex (Romford Office)

PO Box 2401

1<sup>st</sup> Floor

10 South Street

Romford

Essex

**RM1 1BD** 

E-mail:

Belinda.Lane@rbs.co.uk

Telephone: 01708 774529

Facsimile:

01708 733816

Dear Norgon

### Palestinian Relief & Development Fund – Interpal – Account No.95142940-600822

I have attached an E-mail received from the above customer which I feel is solfexplanatory.

Firstly, I feel that you need to discuss the contents of the letter with your staff as there is no excuse for rudeness or unhelpfulness. I don't know whether any alternatives, such as deferred checking, have been discussed with my customers, but would I be more than happy to agree to this if you feel that it may be a solution for the customer.

In view of the fact that this is my largest income earning customer by virtue of the credit balances which they maintain with the Bank, I should be grateful if you would arrange to forward to them an urgent apology and also offer to discuss with them, entirer in person or by phone, some solutions for you both.

I look forward to receiving your comments and also a copy of your apology letter.

Yours sincerely

Belinda Lane Commercial Manager

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2778

**EXHIBIT 106 to Declaration of Joel Israel** 

### Unknown

From: COLE, Guy, CBFM Regulatory Risk Sent: Thursday, May 20, 2004 10:34 AM

**To:** FOSTER, Stephen James, Group Risk Mgmt; NORRIE, Ben, Group Risk Mgmt Cc: RODGER, Irvine, CBFM Regulatory Risk; DAVIES, Rob, Group Risk Mgmt; JONES,

Richard, CBFM Regulatory Risk

Subject: RE: INTERPAL

Attachments: Doc1.doc

### Stephen/Ben

We have ascertained that the payment mentioned below has <u>not</u> gone to the Islamic Charitable Society for al-Aqsa or Al-Aqsa Islamic Charitable Society. Although similarly named, the recipient of this payment is a separate charity <a href="http://www.icshebron.org/branches e.htm">http://www.icshebron.org/branches e.htm</a>, which appears to be operating without any form of sanction placed on it.

From my trawls for information on the internet I have not found any information that substantiates beyond opinion that Interpal has made payments to terrorist groups. It appears the perspective taken by Israel towards Interpal and other charities operating/funding schools/orphanages/hostels in Palestine and Gaza, is that these charities perpetuate terrorism as terrorists know that if they die their dependents will be looked after by the charities. This charity is the predominant UK charity providing relief in this region, it hosted and funded a visit by British MPs to the region in 1998. Looking at the accounts there are also a large number of small (e.g. £2) direct debits being paid into the charity's account from UK donators, and so a change of their banking arrangements will probably result in some form of media commentary.

I attach a summary of my review of Interpal foreign payments in the last six months. All of the recipients of these payments were checked in Worldcheck, KYC Check and reviewed against available Google information



Doc1.doc (113 KB)

In consideration of the information in the document attached above. The background information for the Al-Islah charity, is a an unofficial opinion from an Israeli website and no other reports or recognition of this charity having links to terrorism are recorded on any other websites. The Worldcheck information on the six factually incorrect, they state that the US Federal government and UN have acknowledged that the charity aids and abets terrorism. According to the KYC Check no sanctions have existed against this entity. The source of Worldcheck's information is a student's journal at the University of California. My recent experience of Worldcheck has been disappointing, I will probably write a separate email concerning my Worldcheck findings, but in this instance if your search for the against the WorldCheck 'part match' feature, no matches are found, if you then search for an 'exact match' one result is found.

I am content to leave the Sterling and Euro accounts operating with a semi annual review taking place for foreign payments made from the accounts. Consideration will need to be given regarding the operation of the US Dollar account, as funds from this account will get frozen if they are transferred via a US domiciled/owned counterparty. We should also be alert to any new Charity names being added to the Bank of England's terrorism list. I believe Interpal is aware of the sensitivity of their position, and will be keen to ensure it does not breach Bank of England sanctions.

I'll assume you are happy with approach, unless I hear otherwise.

### Regards

Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<mailto:Guy.Cole@rbos.com>

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 70 of 143 PageID #: 9631

----Original Message----

From: FOSTER, Stephen James, Group Risk Mgmt

**Sent:** 17 May 2004 11:24

To: COLE, Guy, CBFM Regulatory Risk; NORRIE, Ben, Group Risk Mgmt
Cc: RODGER, Irvine, CBFM Regulatory Risk; DAVIES, Rob, Group Risk Mgmt

Subject: RE: INTERPAL

Guy, Ben is away all week, so I am replying on this.

You are correct that filtering is a group wide issue and that is why we have been working with key stakeholders like Payment Operations to develop the policy and capability. This continues and we know that it is a very important element of our counter -terrorism efforts.

On the specific case of Interpal, I can understand the difficulties of filtering payments in the absence of an automated system. However, we do need to monitor account activity and I hope that the RM and MLPU can find a practical way to review the account movements periodically for odd items. You are right to highlight the reputational issues but if management decides they don't want the relationship, there are ways to exit that might not cause a problem.

Please keep us in the loop with your investigations on the payments.

-----Original Message-----

From: COLE, Guy, CBFM Regulatory Risk

**Sent:** 17 May 2004 11:05

To: NORRIE, Ben, Group Risk Mgmt

Cc: FOSTER, Stephen James, Group Risk Mgmt; RODGER, Irvine, CBFM Regulatory Risk

Subject: RE: INTERPAL

Ben

I understand the best people to speak to are either Shirley Ritson on 020 7672 6940 or Sarah Wallis on 020 7672 5826. **Redacted - Privileged** 

### Redacted - Privileged

I realise due to the US terrorist designation of Interpal, that we should be wary of the payments from their accounts with us, but in reality I believe there is very little we can effectively do to prevent payments being made without a payment filtering system, as the customer can initiate payments themselves without needing to contact the RM.

I have not been directly involved with the Interpal issue until your recent correspondence and so have not considered previously the risks myself. I think any decision to keep/close the account must be carefully made, as closing the account without an identifiable reason will most probably result in adverse media attention, also if a terrorism related payment is identified as being made, we again would suffer untoward regulatory/ media attention. I spent Friday looking through the last six months of debits on Interpal accounts, I have seen a couple of payments that warranted further investigation, particularly the below:

Transaction Date:
Transaction Amoun
Transaction Type:
Transaction References:+BTR/04/20-263

Further system investigation has shown the recipient accounts details are the below:

### EBANKGO04373632

Bene acct name:
Bene bank:

I need to conduct further investigations to establish whether this account could be the Islamic Charitable Society for al-Aqsa or Al-Aqsa Islamic Charitable Society. as this entity has been designated a terrorist group by the Bank of England.

Regards

Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<<mailto:Guy.Cole@rbos.com>>

-----Original Message-----

From: NORRIE, Ben, Group Risk Mgmt

**Sent:** 14 May 2004 10:03

To: COLE, Guy, CBFM Regulatory Risk

Cc: FOSTER, Stephen James, Group Risk Mgmt

Subject: RE: INTERPAL

Do you have any contact in the Core Data Manager team that I could try? Is there any kind of agreement between CBFM and Manufacturing that would serve as a mandate to have this work performed on an ongoing basis?

Im and not sure whether you were aware but until a few weeks ago the NatWest logo was used prominently on the Interpal website in soliciting donations. Did you or the RM have Interpal remove this? Are the CBFM MLPU happy with the potential risks in continuing this relationship?

Ben

----Original Message----

From: COLE, Guy, CBFM Regulatory Risk

**Sent:** 06 May 2004 16:51

To: NORRIE, Ben, Group Risk Mgmt

Subject: RE: INTERPAL

Ben

The Relationship Manager is aware of the potential terrorism connections with this account and liased with Derek Brand during the account freeze. Although diligent in their interaction with the customer, the RM has no ability to filter or efficiently monitor payments, I understand that this could be done in the Core Data Manager team in Manufacturing who control payment blocking and restrictions.

Regards

Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<<mailto:Guy.Cole@rbos.com>>

----Original Message-----

From: NORRIE, Ben, Group Risk Mgmt

**Sent:** 06 May 2004 15:55

**To:** COLE, Guy, CBFM Regulatory Risk

Subject: FW: INTERPAL

Guy,

Haven't heard back from you on the below?

Ben.

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 72 of 143 PageID #: 9633

----Original Message----

From: NORRIE, Ben, Group Risk Mgmt

**Sent:** 21 April 2004 17:05

To: COLÉ, Guy, CBFM Regulatory Risk; Derham, Bill (Cards Risk); Sludden, Tom

Cc: DAVIES, Rob, Group Risk Mgmt

Subject: INTERPAL

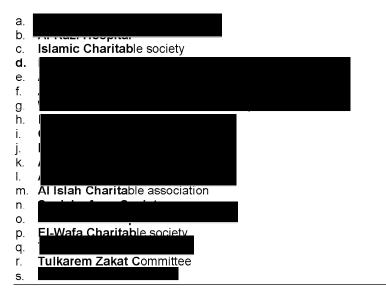
Gentlemen,

You may remember we have previously reported to the Bank of England against INTERPAL and its various aka's (including Education Aid for Palestine, Palestinians Relief & Development Fund, etc). There was an investigation by the Charities Commission and Special Branch in to potential links with Hamas, no action was taken against the charity. At this time we attempted to confirm with the Bank of England that The Bank of England advised that We therefore undertook to monitor the transactions going forward. Can I ask you to investigate whether any enhanced due diligence has been put in place over these accounts (not sure the above was communicated, therefore suspect not) and if not take steps to ensure that measures are put in place. I have some details of the accounts and cards should you require. Please contact me if any of the above is not clear.

### Kind Regards, Ben Norrie

Group Risk Management Royal Bank of Scotland Group 5th Floor, 280 Bishopsgate London EC2M 4RB

Tel: 00 44 (0) 20 7334 1460 Fax: 00 44 (0) 20 7375 4813 Email: ben.norrie@rbos.com Recipients of principal payments made from the Interpal sterling account in the last six months, (the bold letters were the letters recorded on the system). All names have been searched for on the Internet and any untoward information is recorded below



#### C: AL-AQSA FOUNDATION

- -- aka Al-Aqsa Charitable Foundation
- -- aka Sanabil al-Aqsa Charitable Foundation
- -- aka Al-Aqsa Charitable Organization
- -- aka Charitable Al-Aqsa Establishment
- -- aka Aqssa Society
- -- aka Al-Aqsa Islamic Charitable Society
- -- aka Islamic Charitable Society for al-Aqsa
- -- aka Charitable Society to Help the Noble al-Aqsa
- -- aka Agsa Charitable Establishment
- -- aka Swedish Charitable Aqsa Est
- -- aka AQSSA SOCIETY YEMEN
- -- aka Al-Aqsa Charitable Organisation
- (EU) Council Common Position 2001/931/CFSP
- (EU) Council Regulation (EC) No 2580/2001

(Bank of England) Terrorist Financing - List of Suspects

(OFAC) Specially Designated Global Terrorists

(Isle of Man FSC) Sanctions Notice 9 - Afghanistan, Terrorism, Al-Qa'ida and Taliban

(OSFI) United Nations Suppression of Terrorism Regulations (UNSTR)

We have ascertained that the payment mentioned below has <u>not</u> gone to the Islamic Charitable Society for al-Aqsa or Al-Aqsa Islamic Charitable Society. Although similarly named, the recipient of this payment is a separate charity <a href="http://www.icshebron.org/branches\_e.htm">http://www.icshebron.org/branches\_e.htm</a>, which appears to be operating without any form of sanction placed on it.

G)

\* General Legal Notice

LAST NAME:		CATEGORY:2 TERRORISM
FIRST NAME:		SUBCATEGORY: PEP
	<u> </u>	

OFFICIAL LIST(S):

ALIAS(ES):

**ALTERNATIVE SPELLING:** 

TITLE: POSITION:

AGE: DOB:

PLACE OF BIRTH: DECEASED:

PASSPORT(S):

SSN: COUNTRY:

SAUDI ARABIA (SA)

LOCATION(S): SAUDI ARABIA

Company(ies) reported in sources below:

AL QAIDA

**AL-HARAMAIN FOUNDATION** 

AL-HARAMAIN ISLAMIC FOUNDATION

**AL-HARAMAIN ISLAMIC FOUNDATION** 

AL-HARAMAIN ISLAMIC FOUNDATION

AL-SHAMAL ISLAMIC BANK

AMERICAN MUSLIM FOUNDATION

DAR AL-MAAL AL-ISLAMI

<u>HAMAS</u>

INTERNATIONAL ISLAMIC RELIEF ORGANIZATION

MUSLIM WORLD LEAGUE

SANA-BELL, INC

SANABIL AL-KHAIR

SAUDI JOINT RELIEF COMMITTEE

SUCCESS FOUNDATION, INC.

SUPREME COUNCIL FOR ISLAMIC REVOLUTION IN IRAQ

THE SAAR FOUNDATION

THE SAAR FOUNDATION USA

Reported to be linked to:3

AFANDI Ibrahim Muhammad AL-ALI Sulaiman
AL-AQEEL Ageel AL-KADI Mansour

AL-RAJHI Sulaiman Abdul Aziz BAHFZALLAH Hassan AA

BASHA Adan EL-ASHI Arafat
INTERNATIONAL ISLAMIC RELIEF ISLAMIC JIHAD

<u>ORGANIZATION</u>

JABALLAH Mohmous JOHANI Maneh Hammadal

KHALIFA Mohammed Jamal NADA Youssef

OMEISH Mohamed S

The following information was reported in one or more of the sources below: Reportedly founded in 1972 in Riyadh - has funded organizations the federal government and UN have acknowledged aid and abet terrorism. They include the International Islamic Relief Organization, al-Haramain and the Muslim World League

 has been connected with the funding of al Qaeda, Hamas and Islamic Jihad. It has also been directly linked with the 1993 World Trade Center Bombings - headed by Mohammed Khalifa, Osama bin Laden's brother-in-law. 2003.

#### Information Sources:

ARCHIVE <a href="http://www.calpatriot.org/may03/terror.htm">http://www.calpatriot.org/may03/terror.htm</a>

ARCHIVE http://www.takingitglobal.org/opps/orgdir.html?vieworg=226

http://www.webcom.com/hrin/magazine/binladenrelatives.http:/...

ARCHIVE <a href="http://esa.un.org/socdev/unyin/countrya.asp?countrycode=sa">http://esa.un.org/socdev/unyin/countrya.asp?countrycode=sa</a>

#### J: 100% AL-AQSA FOUNDATION

- -- aka Agssa Society
- -- aka Al-Aqsa Islamic Charitable Society
- -- aka Islamic Charitable Society for al-Aqsa
- -- aka Charitable Society to Help the Noble al-Aqsa
- -- aka AQSSA SOCIETY YEMEN
- (OFAC) Specially Designated Global Terrorists
- (EU) Council Common Position 2001/931/CFSP
- (EU) Council Regulation (EC) No 2580/2001
- (Bank of England) Terrorist Financing List of Suspects
- (Isle of Man FSC) Sanctions Notice 9 Afghanistan, Terrorism, Al-Qa'ida and Taliban

(OSFI) United Nations Suppression of Terrorism Regulations (UNSTR)

#### 100% Revival of Islamic Heritage Society

- -- aka Revival of Islamic Society Heritage on the African Continent
- -- aka Revival of Islamic Heritage Society 6
- -- aka Revival of Islamic Heritage Society (RIHS)
- (OFAC) Specially Designated Global Terrorists
- (EU) Council Regulation (EC) No 881/2002
- (EU) Council Regulation (EC) No 467/2001
- (Bank of England) Terrorist Financing List of Suspects
- (Isle of Man FSC) Sanctions Notice 6 Terrorism (United Nations Measures) (Isle of Man) Order 2001
- (Isle of Man FSC) Sanctions Notice 3 Financial Sanctions against Afghanistan, Taliban & Usama Bin Laden
- (Isle of Man FSC) Sanctions Notice 9 Afghanistan, Terrorism, Al-Qa'ida and Taliban
- (United Nations) Security Council Committee established pursuant to resolution 1267 (1999) concerning Afghanistan
  - (OSFI) United Nations Suppression of Terrorism Regulations (UNSTR)

#### 100% JAM'YAH TA'AWUN AL-ISLAMIA

- -- aka SOCIETY OF ISLAMIC COOPERATION
- (OFAC) Specially Designated Global Terrorists
- (EU) Council Regulation (EC) No 881/2002
- (EU) Council Regulation (EC) No 467/2001
- (Bank of England) Terrorist Financing List of Suspects
- (Isle of Man FSC) Terrorist Financing List of Suspects
- (Isle of Man FSC) Sanctions Notice 6 Terrorism (United Nations Measures) (Isle of Man) Order 2001
  - (Isle of Man FSC) Sanctions Notice 3 Financial Sanctions against Afghanistan,

Taliban & Usama Bin Laden

(Isle of Man FSC) Sanctions Notice 9 - Afghanistan, Terrorism, Al-Qa'ida and Taliban

(United Nations) Security Council Committee established pursuant to resolution 1267 (1999) concerning Afghanistan

(OSFI) United Nations Suppression of Terrorism Regulations (UNSTR)

K) www.aloufok.net/article.php3?id\_article=137



M)

http://www.intelligence.org.il/eng/c\_t/ris\_4\_04.htm.

Al-Islah Charitable Association in Ramallah

- a. The association, outlawed in 2002, is known for its direct affiliation with Hamas. It maintains an extensive network of contacts with Hamas activists abroad, who are responsible for the distribution of Hamas funds in the Palestinian Authority administered territories. The association has been active since February 2000. Funds from various associations abroad have been transferred to its account; a significant share of those funds originate from foundations outlawed both in Israel and abroad, such as the Charity Coalition (I'tilaf al-Khayr), the Al-Aqsa Foundation, and the London-based Interpal organization.
- b. Senior Hamas operatives directly involved in military operations rank among the members of the Islamic Association in Al-Birah. The association provides financial assistance to families of killed or detained Hamas operatives; in addition, it sponsors the activity of the Islamic Bloc ( Al-Kutlah al-Islamiyyah ), the Hamas student movement in higher education establishments (outlawed in 2003). The association also finances conventions, demonstrations and memorial ceremonies of the Hamas movement, providing it with a fertile ground for incitement and recruitment of terrorist operatives.
- c. The founder of the association in Ramallah, who also served as its leader until his arrest in April 2002, is Jamal Tawil. He was involved in the suicide bombing attack on the Ben-Yehuda pedestrian shopping street in the heart of Jerusalem (December 2001), in which 11 Israelis were killed and 170 were wounded. During interrogation, Tawil admitted that he had decided to open an Al-Islah branch early in 2000 in order to provide a legal cover for Hamas activity. Furthermore, Tawil pointed out that as part of his activity he had provided financial assistance to Hamas prisoners and their families, and that he had transferred funds to the heads of the Hamas operative headquarters in Ramallah.

**EXHIBIT 107 to Declaration of Joel Israel** 

Fax



Greater London East Commercial Banking Centre

#### Commercial Banking

To:

Account Maintenance

Company:

Bankline-

0161 2429030

1st Floor, 10 South Street Romford

P.O Box 2401

Essex, RM1 1BD

Tel:

01708 774529

Fax:

01708 733816 E-mail: clive.bray@rbs.co uk

Phone No:

Clive Bray

From:

Fax No:

Assistant Manager

Commercial Banking

Date:

03/02/04

No of Pages (including header):

Subject

2

Please call us if this fax transmission is incomplete or illegible.

This message is confidential and for use by the addressee only. The contents are not to be disclosed to anyone other than the addressee. Please advise the sender immediately by telephone of any error in transmission.

Palestinian Relief & Development Fund INTERPAL

Please find attached letter from customer regarding removal of US\$ account from Bankline.

Thanks

32

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Agency agreements exist between members of The Royal Bank of Scotland Group



PO Box 3333 London, NW6 1RW
Tel 020 8450 8002 • Fax: 020 8450 8004
E mail: info@interpal org
Website: www interpal.org
Registered Charity No. 1040094

BELINDA LANE
NATWEST BANK PLC, CORPORATE & COMMERCIAL BANKING
GREATER LONDON EAST, COMMERCIAL BANKING CENTRE
P O BOX 2401, 1<sup>ST</sup> FLOOR
10 SOUTH STREET
ROMFORD, ESSEX
RM1 1BD
FAX NO: 01708-733 816

RECEIVED
- 2 FEB 2004
ISS updated by initials.....

Our Ref: (9742) Date: 25 January 2004

Dear Belinda,

#### Bank Line re: Deletion & Addition of Accounts

Please find attached the forms for the addition of accounts to our Bank Line system. We would like to request that our Main US Dollar Account No: 140-00-04156838 should be taken off the system as we are unlikely to use this account for transfers in the near future. We would appreciate it if you could confirm our instruction as soon as possible in writing.

Thank you for your kind attention and assistance in this matter.

Yours sincerely

I. B. Hewitt

Chairman of the Trustees "

العدد 3 الذاسطيام الاطلاع التصنية HEI PIMP SALESTINIANS IN HEED J. Qundil Secretary to the Tru

INTERPAL ILLERANGE INTERPRING PALESTIMANS IM NEED

HIGHLY CONFIDENTIAL NW 017110

**EXHIBIT 108 to Declaration of Joel Israel** 



Your ref: Our ref

#### STRICTLY PRIVATE & CONFIDENTIAL

Mr J Qundil Interpal PO Box 3333 London NW6 1RW Commercial Banking

London East & West Essex CBC, Romford Office P.O. Box 2401 1st Floor, 10 South Street Romford Essex RM1 1BD

Tel. 01708 774529 Fax: 01708 733816

02 February 2004

Dear Jihad

Following your letter of 25 January 2004. I have forwarded the various forms to our Electronic Banking department and informed them that you no longer wish for US Dollar account 140-00-04156838 to be reported.

Please allow ten working days for all of the updates to take effect.

If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely

Clive Bray Assistant Manager, Commercial Banking

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**₩RBS** 

**EXHIBIT 109 to Declaration of Joel Israel** 

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 83 of 143 PageID #:

9644

From: JONES, Richard, CBFM Regulatory Risk

**Sent:** Friday, June 11, 2004 10:21 AM

**To:** SIMS, Claire, CBFM Regulatory Risk < Claire. SIMS@rbos.com>

Subject: FW: Commercial Bank of Syria (CBS) & Syrian Lebanese Commercial Bank

----Original Message----

From: VIBERT, Karen, Group Risk Mgmt

Sent: 11 June 2004 15:08

To: RODGER, Irvine, CBFM Regulatory Risk

Cc: FOSTER, Stephen James, Group Risk Mgmt; WICKENS, Ian, Group Risk Mgmt; COLE, Guy, CBFM Regulatory Risk; JONES, Richard, CBFM

Regulatory Risk; Miles, Phil

Subject: Commercial Bank of Syria (CBS) & Syrian Lebanese Commercial Bank

Importance: High

Hi Irvine.

I think this is being taken out of context and my email may have been worded a little differently if I had understood it was being more widely circulated than my proposed comments offering some guidance to Ian and on which further discussion was held.

I will therefore now hopefully make the position a little clearer, although would just add in my own warning at this stage that I am not an expert in this area, so I am not making dogmatic statements.

I have not said or recommended that we should sever all ties with Syria. The comment Guy has highlighted in red purely relates to the immediate preceding findings outlined in that paragraph and as advised in the Federal Register; on that basis I therefore commented that it "appeared" the UK should not be transacting business. You will then note that my next line followed that through further with a review of the BOE lists on which CBS & subsidiary were not evidenced and therefore I stated that we needed to "exercise care".

The point here is *not* that we need to totally sever links with CBS & subsidiaries, as there is as yet no UK/ EU requirement in this respect - we do however need to ensure that in our dealings with CBS & its subsidiaries that in no circumstances should we use our correspondent accounts in the US to route / transfer CBS (& its subsidiaries) monies. If we do there is a risk that the US can seize deposits / freeze our accounts, & even ultimately sever that relationship due to lack of compliance adherence.

I made the point that we "could" be in breach of UN sanctions - again reference to FinCEN and the Federal Register - based on the US allegations as raised earlier re Iraqi funds not being transferred to the Development Fund. Although I had looked at the BOE list I do not usually get involved with sanctions so it was a point raised for further appropriate review to check if similar sanctions applied.

Another thought is the need to consider the POCA & Terrorism Act requirements as we have effectively now been put on notice that CBS *may* be harbouring terrorist funds - as such we need to ensure enhanced due diligence is undertaken of this relationship, although I assume this is already the case as Syria is listed in our High Risk Country Policy.

At this time the following are for consideration:

- (1) What are FM NY doing about this and can they confirm that they are comfortable with this relationship?
- (2) What is the GBS / MLPU senior management view of this issue? Are they comfortable to continue this business relationship by way of other non USD currencies and the ability to route the business outside of the US? I note that volume and amounts exercised here are low.
- (3) Obtaining a legal view on this issue of US extra territoriality? Perhaps you can take this forward with Jennifer Burke, Group Legal.

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 84 of 143 PageID #: 9645

(4) Can you confirm enhanced due diligence procedures are being effected?

I don't wish to throw another spanner in the works, but you may also wish to check for any relationships with **Myanmar Mayflower Bank** and **Asia Wealth Bank** where the US imposed special measures effective May 12 2004. I had a further look at BOE website in respect of sanctions against Burma and note that these 2 banks are not listed in the financial sanctions orders. The EC regulations adopted basically list certain targeted individuals related to important government functions in Burma/Myanmar (and their associates) who are subject to the financial sanctions imposed.

Hope this helps and that the situation is certainly not as damning as appeared may have been implied.

#### Regards.

Karen

----Original Message----

From: RODGER, Irvine, CBFM Regulatory Risk

Sent: 11 June 2004 12:44

To: VIBERT, Karen, Group Risk Mgmt

Cc: COLE, Guy, CBFM Regulatory Risk; JONES, Richard, CBFM Regulatory Risk; FOSTER, Stephen James, Group Risk Mgmt; Miles, Phil

Subject: RE: Patriot Act: Commercial Bank of Syria

Karen

My colleague, Guy Cole, has made some perceptive comments on your detailed note on CBS.

As you can see, he is seeking clarification on a number of points. In particular, I am concerned about possible contradictory advice but do acknowledge that he may be missing something of which you are aware. However, on the face of it, the effect of your recommendation to cease transacting business completely would effectively mean that UK trading ties with Syria would effectively cease (if all UK banks were to follow suit) as CBS is the dominant bank in the Syrian market for international business. I think we need to avoid a knee-jerk reaction (to US politics) particularly as the EU (including UK) is seeking to develop trading ties with Syria. The view of GBS is that it is comfortable with its Syrian correspondents (already classified as High Risk and so subject to a great deal of due diligence) so would be very reluctant to cease all business without good reason.

I should be grateful to receive your clarifications

Thanks

PS I have copied in Phil Miles of GBS for his information

#### Irvine Rodger

CBFM MLPU
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7334 1082
F (020) 7375 4641
E irvine.rodger@rbos.com>

----Original Message-----

From: COLE, Guy, CBFM Regulatory Risk

Sent: 11 June 2004 10:26

To: RODGER, Irvine, CBFM Regulatory Risk; GREENFIELD, Katie, CBFM Regulatory Risk; JONES, Richard, CBFM Regulatory Risk;

SIMS, Claire, CBFM Regulatory Risk

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 85 of 143 PageID #: 9646

Subject: RE: Patriot Act: Commercial Bank of Syria

Irvine

I have reviewed Karen's email below. It appears that the proposed Bank Secrecy Act amendment is somewhat similar to existing OFAC sanctions for Cuba and Iran, and to ensure we do not breach its requirements we should not offer US dollar services to CBS (which fortunately I believe we are not).

There was one comment in Karen's email that concerned me (which I have highlighted in red), in which she has said UK institutions should not be transacting business with/via CBS. I am not sure whether this is on the basis of the information she describes immediately before it regarding allegations from the US that CBS is a conduit for terrorist funds, or on specific information in the US notice that covers us dealing in a non US dollar currency with CBS which she has not detailed in her email. We should seek clarification on this. If the former, and she is correct in her assertion, then this would go against previous advice and have consequences on our relationships with entities such as Interpal (an OFAC SDGT).

Karen has also mentioned that we may be in breach of UN sanctions. We should seek clarification on whether this was due to information she has seen, or a suggestion that we check to see if similar sanctions are in place.

Finally a point on briefly mentioned in Karen's email, is that the proposed amendment covers all of the subsidiaries of CBS, I think we should identify who these subsidiaries are, and what other connections we may have in GBS and elsewhere in the bank.

Regards

Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<mailto:Guy.Cole@rbos.com>

-----Original Message-----

From: RODGER, Irvine, CBFM Regulatory Risk

**Sent:** 08 June 2004 14:30

**To:** COLE, Guy, CBFM Regulatory Risk; GREENFIELD, Katie, CBFM Regulatory Risk; JONES, Richard, CBFM Regulatory Risk; SIMS, Claire, CBFM Regulatory Risk

Subject: FW: Patriot Act: Commercial Bank of Syria

Dear All

Please review some detailed analysis from Karen Vibert on the Syrian Commercial Bank matter. I think we should discuss it when next we meet.

Regards

#### Irvine Rodger

CBFM MLPU
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7334 1082

F (020) 7375 4641

E irvine.rodger@rbos.com>

----Original Message----

From: FOSTER, Stephen James, Group Risk Mgmt

Sent: 08 June 2004 13:24

Fo: VIBERT, Karen, Group Risk Mgmt; WICKENS, Ian, Group Risk Mgmt

Cc: RODGER, Irvine, CBFM Regulatory Risk

Subject: RE: Patriot Act: Commercial Bank of Syria

Thanks, helpful summary.

I have copied this to Irvine for info, though I know MLPU is already on the case.

----Original Message----

From: VIBERT, Karen, Group Risk Mgmt

Sent: 08 June 2004 13:21

To: WICKENS, Ian, Group Risk Mgmt

Cc: FOSTER, Stephen James, Group Risk Mgmt

Subject: RE: Patriot Act: Commercial Bank of Syria

lan, the notice of this proposed rulemaking was issued by FinCEN in the Federal Register 18/5/04.

The position as regards US entities is that they must terminate any correspondent accounts established, maintained, administered, or managed in the US for, or on behalf of, Commercial Bank of Syria; they must also guard against their indirect use by Commercial Bank of Syria.

Therefore as a minimum US financial institutions are required to:

- 1)Notify correspondent account holders that they may not provide Commercial Bank of Syria with access to the correspondent account maintained at the financial institution; and
- 2) Take reasonable steps to identify any indirect use of the correspondent accounts by Commercial Bank of Syria, to the extent that such indirect use can be determined from transactional records maintained in the financial institution 's normal course of business.
- 3)The US financial institution should take a risk-based approach when deciding what, if any, additional due diligence measures it should adopt to guard against the indirect use of its correspondent accounts by Commercial Bank of Syria.
- 4)If the US financial institution obtains knowledge that a correspondent account is being used by a foreign bank to provide indirect access to Commercial Bank of Syria, it must take all appropriate steps to block such indirect access, including, where necessary, terminating the correspondent account.

From a UK perspective, it could be possible for the U.S. government to claim jurisdiction over a non-U.S.entity's assets if that entity uses U.S. jurisdictional means in order to do business with a customer. We have already evidenced with RBSG that the U.S. government can seize deposits held in foreign correspondent accounts in U.S. banks for foreign bank's customers engaged in money laundering / terrorist activities impacting the U.S. The US "extra-territorial jurisdiction" can apply to a financial transaction that occurs "in whole or part" in the U.S. if the funds involved were derived from money laundering /terrorism crimes that include drug trafficking, extortion, fraud against a foreign bank, kidnapping, robbery, or destruction of property by explosion or fire.

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 87 of 143 PageID #: 9648

The Notice in the Federal Register advises that FinCEN does not require or expect US financial institutions to obtain certification from its correspondent account holders that indirect access will not be provided in order to comply with this notice requirement. They may however satisfy this requirement by transmitting a one-time notice to all of their correspondent account holders by way of mail, fax, or email, advising:

"Notice:Pursuant to U.S. regulations issued under section 311 of the USA PATRIOT Act, 31 CFR 103.188, please be informed that you are prohibited from providing Commercial Bank of Syria or any of its subsidiaries including Syrian Lebanese Commercial Bank) with access to the correspondent account(s) that we maintain for or on behalf of your institution. Any failure to comply with this prohibition may result in the termination of the affected correspondent account."

In this case we are led to believe that CBS has been used by terrorists and/or persons associated with terrorist organisations; in addition, CBS has maintained accounts containing the proceeds from the illicit sale of Iraqi oil in violation of UN sanctions. Some of the money appears to have been used to purchase military weapons which may now be in use against coalition troops in Iraq. Funds have not be frozen and transferred to the Development Fund of Iraq. We are also advised that numerous transactions through accounts at CBS reference a reputed financier for Osama bin Laden. As such, it certainly appears that UK financial institutions should <u>not</u> be transacting business with / via the CBS.

I did not evidence CBS on the Bank of England list as yet, but it would appear that we do need to now exercise care.

It would therefore appear that:

- we can expect to receive notices from US financial institutions regarding this prohibition on correspondent accounts;
- we will need to ensure that we are not providing access to these for CBS;
- any failure on our part to comply with the notice could put our US funds at risk of being frozen by the US authorities;
- we could also be in breach of UN sanctions.

I would certainly suggest that this is something the BBA should take up with HMT, perhaps with some coverage on extra-territorial jurisdiction in the 3MLD, but specifically with regard to future similar requirements in this respect and in the nature of international co-operation and information sharing.

As mentioned earlier I have emailed Carolyn at CFG to see what, if any, written procedures they have in this respect, and will advise you accordingly when I receive her response.

Hope this helps.

Karen

----Original Message----

From: WICKENS, Ian, Group Risk Mgmt

Sent: 08 June 2004 11:03

To: RODGER, Irvine, CBFM Regulatory Risk; JONES, Richard, CBFM

Regulatory Risk; Miles, Phil

Cc: FOSTER, Stephen James, Group Risk Mgmt; VIBERT, Karen, Group Risk

Mgmt; NORRIE, Ben, Group Risk Mgmt

Subject: FW: Patriot Act: Commercial Bank of Syria

I think I should alert you to this fairly promptly noting the deadline for comment. We will give some thought to it also but any initial thoughts? We can envisage a flurry of activity from US correspondents demanding assurances that we do not transact with CBS.

regards

lan
lan Wickens
Senior Policy Consultant,
Anti-Money Laundering
Group Risk Management
The Royal Bank of Scotland Group
5th Floor, 280 Bishopsgate
London EC2M 4RB

Tel: 020 7334 1409 (Internal 7 6572 1409) E-mail: lan.WICKENS@rbos.com

----Original Message----

From: Jeremy Thorp [<mailto:Jeremy.Thorp@bba.org.uk>]

Sent: 07 June 2004 09:45 To: administrator@bba.org.uk

Subject: Patriot Act: Commercial Bank of Syria

To: MLPG MLAP

Date: 7 June 2004

Please see the attached note on a recent decision by the US authorities affecting relations with the Commercial Bank of Syria and correspondent bank accounts with US banks.

Please let me know if this is an issue affecting UK banks which we should raise either with the UK or US authorities. The deadline for comments to the US is 17 June.

Jeremy Thorp Director, Financial Crime, BBA Tel: (020) 7216-8853 Email: jeremy.thorp@bba.org.uk

\*\*\*\*\*\*\*\*\*\*\*\*

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<< File: 180757.DOC >>

**EXHIBIT 110 to Declaration of Joel Israel** 

Lane, Belinda

Case, Gina

Subject:

RE: 1231-24JUN04

Hi Gina

Tried to phone you but only got an answerphone. Can I suggest that you phone Jihad Qundil at Interpal on 0208 450 8002. This is a very valuable connection so let's tread carefully but I wouldn't think we will have any problems here. If you need to speak to me or my asst Clive please phone 01708 774529.

#### Belinda Lane

----Original Message-From:

Case, Gina

Sent:

11 August 2004 10:05

To:

Lane, Belinda

Subject:

FW: 1231-24JUN04

Importance:

High

----Original Message-

From:

Case, Gina

Sent: To:

11 August 2004 10:05 LANE, Belinda, Bus Mgr

Subject:

1231-24JUN04

Importance: High

--Original Message-----

From: Case, Gina

Sent: 28 July 2004 10:01

To: LANE, Belinda, Bus Mgr 1231-24jun04

Subject:

Hello Belinda, sorry to bother you. Are you the Bus Mgr for Interpal T/A Palestinians dev fund.

If so we have got an investigation on the go at the moment. We credited their euro account 550 00 08524882 in error on 09/06/04, with a letter requesting debit authority out to them on 15/07/04, to date we haven't had a response.

Do you know anything about this, or do you have contact details of anybody that could help.

#### Kind Regards.

Gina Case Funds at Risk Central Investigations Unit Depot Code 049

Tel - (0161) 829-1701 Fax - (0161) 829-1337

Gina Case Funds at Risk Central Investigations Unit Depot Code 049

Tel - (0161) 829-1701 Fax - (0161) 829-1337 **EXHIBIT 111 to Declaration of Joel Israel** 

## **NatWest**

J Qundil Esq Interpal PO Box 3333 London **NW61RW** 

24 November 2004

P O Box 2401 1st Floor, 10 South Street Romford Essex **RM1 1BD** Tel: 01708 774529 Fax: 01708 733816 Dy 14 days Mobile: 07900 407271

Commercial Banking

Email: belinda.lane@rbs.co.uk

**England & Wales** 

#### Dear Jihad

Firstly, many thanks for your invitation to your Anniversary Celebrations. Unfortunately, I have a personal commitment that evening, so I won't be able to attend either event.

Further to our recent meeting and your letter dated 22 November, I have been liasing with the Bank's Payment Queries department in respect of your concerns and list their responses to your queries below :-

- The reason provided by the Arab Bank in London for returning your payments, was that they were advised by their Middle Eastern branches that there were restrictions on the remitter and that they were referring to the US for instructions as Interpal were on the OFAC list. We have been unable to obtain any further detail and I would suggest that you contact the Arab Bank in the Middle East.
- 2. We now understand that the money did leave the Arab Bank in London and was transferred to their Middle East branch. Once the monies were returned to NatWest, we were therefore unable to release the funds back to you until we had received confirmation from the beneficiary bank that they hadn't acted on the payments.
- 3. With regard to the charges, these have been taken by the Arab Bank in the Middle East and we have contacted Arab Bank London to query these. I will return to you once we have received a response.
- 4. I should be grateful if you would provide me with details of the 4 payments which have not been returned as we are only aware of 3 that remain outstanding.
- 5. The payment which was routed through Citibank cannot be re-credited to your account until the Bank has received a licence from OFAC to release the monies to you. The licence has already been applied for.
- 6. I have enclosed the appropriate form to enable you to add a further signatory to your account.

National Westminster Bank Pic is authorised and regulated by the Financial Services Authority and represents the NatWest Marketing Group. The Bank sells life policies, units in collective investment schemes and pension products and advises only on the Marketing Group's range of these products, on a With Profit Bond produced by Norwich Union Life (RBS) Limited and also on the RBS Investment Funds ICVC operated by RBS Collective Investment Funds Limited. National Westminster Bank Pic. Registered in England No 929027. Registered Office: 135 Bishopspate, London EC2M 3UH.

₩RBS

are reate

7. With regard to future payments, I would recommend that you refer to the charitable organisations that you support and seek their advice as to the Banks through which you can route your donations.

Finally I have also enclosed the autopay mandates which Adlin requested.

Yours sincerely

Belinda Lane Manager, Commercial Banking

## **EXHIBIT 112 to Declaration of Joel Israel**

## SYNOPSIS OF CUSTOMER MEETING

DATE	18/11/04
CUSTOMER	Interpal
ATTENDEES	Belinda Lane, NWB, Jihad Qundil
LOCATION	Cust's premises Cricklewood

- Met with Jihad at his request to discuss the recent payments which were refused by Arab Bank. There are pymts in total which were donations and were routed to the beneficiary via Arab Bank. However, Arab Bank in London have refused to accept the payments. I understand from Kate Dingwall in Payment Queries (0161 829 1426) that she has now received the payments back but is awaiting confirmation from the Arab Bank that each individual pymt has not reached the beneficiary before she can recredit our customer
- Jihad has requested a letter advising why the monies were refused and Kate has
  advised that the Arab Bank in London's swift message states that the payment has
  been refused because 'restrictions are in place'. PM PLEASE ADVISE JIHAD
  BY PHONE WHEN YOU ADVISE HIM THAT PYMTS HAVE BEEN RET'D
- Jihad also queried a further pymt to Cairo-Amman Bank which was routed via Citibank and has also been refused. I am told that this was reported to OFAC (Office of fgn assets control) on 9/8 as Citibank have blocked the payments. The Bank's payment queries office has to request a licence from OFAC in order to release the monies back to customer
- Jihad also queried whether an account could be opened which did not state the Interpal name in order that they can try and get donations through I have requested further information on the name of the account, signatories etc but feel that we will have to be very careful here and may possibly not be able to assist.

**EXHIBIT 113 to Declaration of Joel Israel** 



Interpal – PO Box 3333, London, NW6 1RW
Tel: 020 8450 8002 • Fax: 020 8450 8004
E-mail: info@interpal.org
Website: www.interpal.org

BELINDA LANE
NATWEST BANK PLC, CORPORATE & COMMERCIAL BANKING
GREATER LONDON EAST, COMMERCIAL BANKING CENTRE
P O BOX 2401, 1<sup>ST</sup> FLOOR
10 SOUTH STREET
ROMFORD, ESSEX
RM1 1BD
FAX NO: 01708-733 816

FIRST VIEW BY FAX

Our Ref: (10496) Date: 01 December 2004

Dear Belinda,

#### Failed Transfers

Thank you for your letter of 24 November 2004. I would like to address points 3, 4 and 5 you raised.

- a) Point 3 We appreciate your efforts. We expect a refund, so please keep us posted as to developments.
- b) Point 4 As per my letter of 24 November 2004 (Our Ref: 10425) there are only 2 payments still not returned as regards the failed Arab Bank transfers. Details accompanied the letter of the 24<sup>th</sup>.
- c) Point 5 As far as we are concerned, our 'quarrel' is with NatWest Bank. We never instructed NatWest to go via Citibank. We have nothing to do with Citibank, and would like the money to be returned to us by NatWest without delay. It is then up to NatWest to ask Citibank to return what we consider NatWest funds, not ours. The error was made by NatWest, and we should not have to suffer for it as who knows when OFAC will grant a licence.

I trust you will look into these matters and revert back to me as soon as possible. Thank you for your kind attention, and I await your early response.

Yours sincerely Town In TERPAL

INTERPAL

INTERPAL

J. Quindil HELPING PALES PINTANS AT NEED

CEO

RESERVE CRAWN DIAMES TOWN

**EXHIBIT 114 to Declaration of Joel Israel** 



Interpal – PO Box 3333, London, NW6 1RW
Tel: 020 8450 8002 • Fax: 020 8450 8004
E-mail: info@interpal.org
Website: www.interpal.org

BELINDA LANE
NATWEST BANK PLC, CORPORATE & COMMERCIAL BANKING
GREATER LONDON EAST, COMMERCIAL BANKING CENTRE
P O BOX 2401, 1<sup>ST</sup> FLOOR
10 SOUTH STREET
ROMFORD, ESSEX
RM1 1BD
FAX NO: 01708-733 816

FIRST VIEW BY FAX

Our Ref: (10602)

Date: 09 December 2004

Dear Belinda,

#### Failed Transfers & Application for OFAC License

This is to acknowledge receipt of the reply dated 2 December 2004 sent by Clive (Bray) in your absence. I would like to thank you both for your kind attention in dealing with the matters I raised. I confirm that we have been credited with two payments – one for and the other for in respect of payments reference B and D attached to my letter of 24 November 2004 (Our Ref: 10425). However, there are still outstanding issues in respect of payments reference A and C as already explained with copy documents provided.

Payment Reference A

We clearly requested the payment to go by using the code CAABJOAMXXX. We have been using this route, and have never had problems before. All other payments sent this way have all gone through without ever going through Citibank.

Payment Reference C

Again, this is the same story as Ref A above. This is how we normally transfer our funds. In fact, after the failed transfer we re-transferred the funds (the original plus an additional on (Ref E) using exactly the same template as we have previously used. This latter went through with no problems whatsoever.

This being the case, it is clear that we have not done anything differently. We have re-transferred both sets of funds in respect of Payments Ref A and C. What we require is for NatWest to reimburse the funds, and then apply for the return of funds from OFAC. It states on the OFAC license application that anyone with interest may apply. It is surely in NatWest's interest to do so. An application from NatWest due to the bank's error would in any case stand a better chance of obtaining an OFAC license. We feel we do not stand a chance if we applied ourselves.

With this in mind, I would appreciate your co-operation in the matter.

Yours sincerely

J. Qundik NTERPAL CEO التعمية الالمادة والتعمية HELPING PALESTIRIANS IN MEED

## **EXHIBIT 115 to Declaration of Joel Israel**

## **COLE, Guy, CBFM Enterprise Risk**

9663

From:

RODGER, Irvine, CBFM Enterprise Risk

Sent:

Wednesday, December 22, 2004 04:28 AM

Lane, Belinda; COLE, Guy, MLPU

Cc: Wyles, Graeme; ZZLOVE, Kevin. Corporate Markets

**Subject:** RE: Closure of the Interpal US dollar account

#### Belinda

Thanks for your help and assistance here. It is good that Interpal is being so co-operative.

#### Regards

Irvine Rodger
CBFM MLPU
The Royal Bank of Scotland plc
135 Bishopsgate, London, EC2M 3UR (Depot 028)
Tel: (020) 7085 1082
Int: 361082
Fax: (020) 7085 4641
e: irvine.rodger@rbos.com

----Original Message----

From: Lane, Belinda Sent: 22 December 2004 08:47

To: COLE, Guy, CBFM Enterprise Risk

Cc: RODGER, Irvine, CBFM Enterprise Risk; Wyles, Graeme Subject: RE: Closure of the Interpal US dollar account

I have now spoken with customers and they had intended to close the dollar account anyway. They propose to tf the funds to another charity and will provide me with details in due course. I have asked them to return to me in 14 days given the holiday period. They have also agreed to remove the details from their website and I have diarised to check this in 14 days.

#### Belinda Lane

----Original Message----

From: COLE, Guy, CBFM Enterprise Risk

Sent: 17 December 2004 17:00

To: Lane, Belinda

Cc: RODGER, Irvine, CBFM Enterprise Risk; Wyles, Graeme

Subject: Closure of the Interpal US dollar account

Importance: High

#### Belinda

As discussed in our telephone conversation earlier, due to the US restrictions on Interpal, we feel it would be appropriate to close the Interpal US Dollar account. If Interpal are unwilling to cooperate with the closure of the US dollar account (the balance is roughly many need to devise a way of restricting the account's operation.

We are also aware that the US dollar account details are present on Interpal's website, please ask Interpal to remove this reference from their website asap.

#### Redacted - Privileged

# 

I appreciate that this may be a difficult request to make, and as you said in our conversation we will probably need to give a formal written request. I suggest that if a written request is required, we formulate and send it in the New Year. We can use the time before the New Year to raise the subject with Interpal and also to consider what restrictions we could put on the account's operation if it were to stay open, although leaving the account open is not desirable.

I am out of the office next week until Friday (and hopefully not in for too long on Friday!), if you would like to liaise with somebody in my unit during my absence, please contact Irvine Rodger.

Regards

Guy

Guy Cole CBFM Money Laundering Prevent Unit The Royal Bank of Scotland 135 Bishopsgate, London, EC2M 3UR (020) 7085 5433 76572 365433 Internal (020) 7085 4641 Fax. <<mailto:Guy.Cole@rbos.com>>

CBFM MLPU Website: <a href="http://cbfmweb.fm.rbsgrp.net/cbfmmlpu/">http://cbfmweb.fm.rbsgrp.net/cbfmmlpu/</a> (Answers to many

frequently asked questions can be found on this website)

\* \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

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http://www.rbs.co.uk/CBFM

http://www.rbsmarkets.com

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## **EXHIBIT 116 to Declaration of Joel Israel**

SYNOPSIS OF CUSTOMER Phone call

DATE	31/12/04
CUSTOMER	Interpal
ATTENDEES	Belinda Lane
LOCATION	

Jihad Qundil phoned to advise that he has located an Indian charity with a US \$ acc in London with Canara Bank and as NWB have requested that he close his dollar acc, wishes to send the balance to this charity. However ivo previous problems he required assurance that the money would not be returned nor sent out of this country via America. After checking with IBC I have advised him that the monies would not leave this country but rather that internal tfs between the Bank's nostro and vostro accs are made.

I have referred this matter to Bob Dalton who believes that reference to our customer would probably be detailed on the internal tfs but this is not a matter that we need to clarify with custs.

I have therefore informed Jihad that he must tf the money at his own risk and that I cannot confirm whether or not America would be made aware of a transfer of US dollars. Alternatively the monies can be withdrawn in cash, which is not sensible as he would probably have difficulty paying them over a Bank's counter into another account, or convert the dollars into sterling.

Either way customer is on notice to close the \$ acc and we remain in diary.

Bare

## **EXHIBIT 117 to Declaration of Joel Israel**

26 Jan 05 12:00

Interpal

020 450 8004

만 1



Interpal – PO Box 3333, London, NW6 1RW
Tel: 020 8450 8002 • Fax: 020 8450 8004
E-mail: info@interpal.org • Website: www.interpal.org
Registered Charity No. 1040094

BELINDA LANE
NATWEST BANK PLC, CORPORATE & COMMERCIAL BANKING
GREATER LONDON EAST, COMMERCIAL BANKING CENTRE
P O BOX 2401, 1<sup>ST</sup> FLOOR
10 SOUTH STREET
ROMFORD, ESSEX
RM1 1BD
FAX NO: 01708-733 816

**BY FAX** 

Our Ref: (17112) Date: 26 January 2005

Dear Belinda,

#### Closure of INTERPAL's USD Account

Following NatWest's wish for INTERPAL to close its USD Account (No: 140004156838) we write to confirm that we have taken details of our USD account off our website, and made arrangements for one of our partners here in the UK with a UK Lloyds TSB bank account to receive the funds on trust as part of an agreed partnership protocol that we have with the United Nations Economic and Social Committee for Western Asia (UNESCWA). The funds have been earmarked for a joint agricultural project starting this year between NGO partners and UNESCWA.

We understand from you that such an inland tansfer of funds would not be affected by our designation by the US authorities. We have no problems with you effecting the transfer provided you can guarantee that the funds are safely transferred to our partner's USD account in the UK strictly via the UK only, and does not involve routing through the US.

Given the proviso above, we leave for you to make the necessary arrangements as you see fit to transfer the funds safely either by wire, banker's draft or cash deposit to the following account:



Thank you for your kind attention, and we look forward to hearing from you as to what NatWest has effected to close our account and transfer the funds securely to

Yours sincerely

Ibrahim Hewitt Chairman of the Trustees J. Qundil CEO

# EXHIBIT 118 to Declaration of Joel Israel (Bank Transfer, 15 pages)

This document has been filed Under Seal

## **EXHIBIT 119 to Declaration of Joel Israel**

# **NatWest**

Memo

Attn Ko

**Currency Account Operations** 

Commercial Banking England & Wales

P O Box 2401

1st Floor, 10 South Street

Romford

Essex

RM1 1BD

Tel: 01708 774529 Fax: 01708 733816 Mobile: 07900 407271

Email: belinda.lane@rbs.co.uk

Tel:

From:

To:

01708 774529

Clive Bray Portfolio Manager

Date:

7 February 2005

Re: Closure of US\$ account

Please close account 140/00/04156838 and issue a US\$ draft for the balance payable to Please send the draft to Mr Jihad Qundil, Palestinian Releif & Development Fund, PO Box 3333, London NW6 1RW.

I have attached customers closing account authority and after reference to Money Laundering provention unit it has been decided that the balance should be sent to the customer by way of a draft.

Thank you for your assistance in this matter.

Clive Bray

Portfolio Manager ISV 85198455

**EXHIBIT 120 to Declaration of Joel Israel** 

### **DAVIES, Rob, Group Risk Mgmt**

From:

NORRIE, Ben, Group Risk Mamt

Sent:

03 December 2004 13:13

To:

FOSTER, Stephen James, Group Risk Mamt; DAVIES, Rob, Group Risk Mamt

Subject:

FW: INTERPAL

Attached is the last correspondence I have on Interpal.

I have looked at the comment that is available on open source. There is a lot of comment from right wing US lob bying bodies, including some fairly robust attacks on UK foreign policy and the harbouring of Interpal. Some evidence is presented of the alleged Interpal links to Hamas but this does not seem to be substantiated. On the other side there are numerous protestations from Islamic groups in the UK that the US actions and allegations are baseless and that the actions against Interpal amount to harassment.

After reading the various open source information, I am of the view that the US action against Interpal is as much about Foreign Policy as Terrorism. The UK has a different view on engagement in Israel / Palestine. On this basis, and given that the UK government has not taken any action, I am happy with the approach recommended by Guy

What are you thoughts? Maintaining the relationship will still put us outside the Group standards - do we need to have this signed off?

Ben

FYI - I noted one reference in my search to the fact that NatWest provides Interpal their banking facilities.

----Original Message-----

From:

FOSTER, Stephen James, Group Risk Mgmt

Sent:

20 May 2004 16:34

To:

COLE, Guy, CBFM Regulatory Risk; NORRIE, Ben, Group Risk Mgmt

Cc:

RODGER, Irvine, CBFM Regulatory Risk; DAVIES, Rob, Group Risk Mgmt; JONES, Richard, CBFM Regulatory Risk

Subject: RE: INTERPAL

This is a very thorough appraisal of the position and I support the proposal, with one question - is semi-annual sufficient for the £ and Euro accounts?

Please send your views on Worldcheck. They have asked me to meet a potential customer and I intend to tell how it has been and is, warts and all

-----Original Message-----

From:

COLE, Guy, CBFM Regulatory Risk

Sent:

20 May 2004 15:34

To:

FOSTER, Stephen James, Group Risk Mgmt; NORRIE, Ben, Group Risk Mgmt

Cc:

RODGER, Irvine, CBFM Regulatory Risk; DAVIES, Rob, Group Risk Mgmt; JONES, Richard, CBFM Regulatory Risk

Subject: RE: INTERPAL

#### Stephen/Ben

We have ascertained that the payment mentioned below has <u>not</u> gone to the Islamic Charitable Society for al-Aqsa or Al-Aqsa Islamic Charitable Society. Although similarly named, the recipient of this payment is a separate charity <http://www.icshebron.org/branches\_e.htm>, which appears to be operating without any form of sanction placed on it.

From my trawls for information on the internet I have not found any information that substantiates beyond opinion that Interpal has made payments to terrorist groups. It appears the perspective taken by Israel towards Interpal and other charities operating/funding schools/orphanages/hostels in Palestine and Gaza, is that these charities perpetuate terrorism as terrorists know that if they die their dependents will be looked after by the charities. This charity is the predominant UK charity providing relief in this region, it hosted and funded a visit by British MPs to the region in 1998. Looking at the accounts there are also a large number of small (e.g. £2) direct debits being paid into the charity's account from UK donators, and so a change of their banking arrangements will probably result in some form of media commentary.

In consideration of the information in the document attached above. The background information for the Al-Islah charity, is a an unofficial opinion from an Israeli website and no other reports or recognition of this charity having links to terrorism are recorded on any other websites. The Worldcheck information on is factually

1

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 114 of 143 PageID #: 9675

incorrect, they state that the US Federal government and UN have acknowledged that the charity aids and abets terrorism. According to the KYC Check no sanctions have existed against this entity. The source of Worldcheck's information is a student's journal at the University of California. My recent experience of Worldcheck has been disappointing, I will probably write a separate email concerning my Worldcheck findings, but in this instance if your search for the against the WorldCheck 'part match' feature, no matches are found, if you then search for an 'exact match' one result is found.

I am content to leave the Sterling and Euro accounts operating with a semi annual review taking place for foreign payments made from the accounts. Consideration will need to be given regarding the operation of the US Dollar account, as funds from this account will get frozen if they are transferred via a US domiciled/owned counterparty. We should also be alert to any new Charity names being added to the Bank of England's terrorism list. I believe Interpal is aware of the sensitivity of their position, and will be keen to ensure it does not breach Bank of England sanctions.

I'll assume you are happy with approach, unless I hear otherwise.

Regards

Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<mailto:Guy.Cole@rbos.com>

----Original Message-----

From: FOSTER, Stephen James, Group Risk Mgmt

Sent: 17 May 2004 11:24

To: COLE, Guy, CBFM Regulatory Risk; NORRIE, Ben, Group Risk Mgmt
Cc: RODGER, Irvine, CBFM Regulatory Risk; DAVIES, Rob, Group Risk Mgmt

Subject: RE: INTERPAL

Guy, Ben is away all week, so I am replying on this.

You are correct that filtering is a group wide issue and that is why we have been working with key stakeholders like Payment Operations to develop the policy and capability. This continues and we know that it is a very important element of our counter-terrorism efforts

On the specific case of Interpal, I can understand the difficulties of filtering payments in the absence of an automated system. However, we do need to monitor account activity and I hope that the RM and MLPU can find a practical way to review the account movements periodically for odd items. You are right to highlight the reputational issues but if management decides they don't want the relationship, there are ways to exit that might not cause a problem.

Please keep us in the loop with your investigations on the payments.

----Original Message----

From: COLE, Guy, CBFM Regulatory Risk

Sent: 17 May 2004 11:05 To: NORRIE, Ben, Group Risk Mgmt

Cc: FOSTER, Stephen James, Group Risk Mgmt; RODGER, Irvine, CBFM Regulatory Risk

Subject: RE: INTERPAL

Ben

I understand the best people to speak to are either Shirley Ritson on 020 7672 6940 or Sarah Wallis on 020 7672 5826

Redacted - Privileged
Redacted - Privileged

I realise due to the US terrorist designation of Interpal, that we should be wary of the payments from their accounts with us, but in reality I believe there is very little we can effectively do to prevent payments being made without a payment filtering system, as the customer can initiate payments themselves without needing to contact the RM

I have not been directly involved with the Interpal issue until your recent correspondence and so have not

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 115 of 143 PageID #: 9676

considered previously the risks myself. I think any decision to keep/close the account must be carefully made, as closing the account without an identifiable reason will most probably result in adverse media attention, also if a terrorism related payment is identified as being made, we again would suffer untoward regulatory/ media attention. I spent Friday looking through the last six months of debits on Interpal accounts, I have seen a couple of payments that warranted further investigation, particularly the below:

Transaction Date:
Transaction Amount:
Transaction Type.
Transaction References

Further system investigation has shown the recipient accounts details are the below:

#### EBANKGO04373632

Bene acct name:
Bene acct nmbr:

I need to conduct further investigations to establish whether this account could be the Islamic Charitable Society for al-Aqsa or Al-Aqsa Islamic Charitable Society, as this entity has been designated a terrorist group by the Bank of England.

#### Regards

#### Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<<mailto:Guy.Cole@rbos.com>>

#### ----Original Message----

From: NORRIE, Ben, Group Risk Mgmt

**Sent:** 14 May 2004 10:**0**3

To: COLE, Guy, CBFM Regulatory Risk

Cc: FOSTER, Stephen James, Group Risk Mgmt

Subject: RE: INTERPAL

Do you have any contact in the Core Data Manager team that I could try? Is there any kind of agreement between CBFM and Manufacturing that would serve as a mandate to have this work performed on an on-going basis?

Im and not sure whether you were aware but until a few weeks ago the NatWest logo was used prominently on the Interpal website in soliciting donations. Did you or the RM have Interpal remove this? Are the CBFM MLPU happy with the potential risks in continuing this relationship?

#### Ben

#### ----Original Message-----

From: COLE, Guy, CBFM Regulatory Risk

Sent: 06 May 2004 16:51

To: NORRIE, Ben, Group Risk Mgmt

Subject: RE: INTERPAL

#### Ben

The Relationship Manager is aware of the potential terrorism connections with this account and liased with Derek Brand during the account freeze. Although diligent in their interaction with the customer, the RM has no ability to filter or efficiently monitor payments, I understand that this could be done in the Core Data Manager team in Manufacturing who control payment blocking and restrictions

#### Regards

Guy

Guy Cole
CBFM Money Laundering Prevent Unit
The Royal Bank of Scotland
135 Bishopsgate, London, EC2M 3UR
T (020) 7375 5433
F (020) 7375 4641
<<mailto:Guy.Cole@rbos.com>>

----Original Message-----

From: NORRIE, Ben, Group Risk Mgmt

Sent: 06 May 2004 15:55

To: COLE, Guy, CBFM Regulatory Risk

Subject: FW: INTERPAL

Guy,

Haven't heard back from you on the below?

Ben

----Original Message----

From: NORRIE, Ben, Group Risk Mgmt

Sent: 21 April 2004 17:05

To: COLE, Guy, CBFM Regulatory Risk; Derham, Bill (Cards Risk); Sludden, Tom

Cc: DAVIES, Rob, Group Risk Mgmt

Subject: INTERPAL

Gentlemen,

You may remember we have previously reported to the Bank of England against INTERPAL and its various aka's (including Education Aid for Palestine, Palestinians Relief & Development Fund, etc). There was an investigation by the Charities Commission and Special Branch in to potential links with Hamas, no action was taken against the charity. At this time we attempted to confirm with the Bank of England that

The Bank of England advised that

We therefore undertook to monitor the transactions going forward. Can I ask you to investigate whether any enhanced due diligence has been put in place over these accounts (not sure the above was communicated, therefore suspect not) and if not take steps to ensure that measures are put in place. I have some details of the accounts and cards should you require. Please contact me if any of the above is not clear.

Kind Regards, Ben Norrie

Group Risk Management Royal Bank of Scotland Group 5th Floor, 280 Bishopsgate London EC2M 4RB

Tel: 00 44 (0) 20 7334 1460 Fax: 00 44 (0) 20 7375 4813 Email: ben.norrie@rbos.com

## **EXHIBIT 121 to Declaration of Joel Israel**

9679

From: HOLT, Amanda, Group Risk Mgmt (nee Turner)
Sent: Wednesday, December 15, 2004 08:26 AM

To: LOVE, Kevin, CBFM FW: Google Alert - nat-west

Attachments: Picture (Metafile)1

FYI

Amanda Holt Head of Group Enterprise Risk

Tel no: 020 7334 1148 Fax no: 020 7375 4106 Mobile: 07789 928 481

Internet: amanda.holt@rbos.com

----Original Message---From: Outhwaite, David
Sent: 10 December 2004 11:24

To: HOLT, Amanda, Group Risk Mgmt (nee Turner)

Subject: RE: Google Alert - nat-west

Amanda this is the article.

David

How Terrorist Propaganda Kills

By Rachel Ehrenfeld <authors.asp?ID=579> FrontPageMagazine.com | December 10, 2004 Tony Blair and the Europeans are focusing their attention on the creation of a Palestinian state as the magic formula for peace in the Middle East. At the same time, they are turning a blind eye to the growing propaganda and fundraising campaign on websites and TV stations in their own countries.

The Europeans' behavior is not surprising. Their top foreign policy official, Javier Solana, the EU High Representative for Foreign and Security Policy, expressed a "deep sadness" over the death of Yasser Arafat, the failed Palestinian leader who initiated the culture of death and destruction. Solana further suggested that the best way to commemorate him is to follow in his footsteps. In fact, he outdid Arafat by negotiating with HAMAS, which the EU itself has designated as a terrorist organization.

The most active HAMAS front organization worldwide is the London-based Interpal, which publishes anti-American and anti-Israeli propaganda, and which in 2003 alone sent more than \$20 million to different HAMAS organizations in the Palestinian territories. In addition to fundraising in England in Pounds Sterling, Interpal lists on its website four different bank accounts to which contributors can send money. All the accounts are with Nat West Bank, and the international scope of the organization is evident by dedicated dollar and euro accounts.

And England is not alone. While the French Prime Minister Jean-Pierre Raffarin is calling to shut down Al-Manar, Hizbollah's TV broascasting in France, his country continues to host the Paris-based HAMAS front organization, Votre Partenaire Humanitaire en Palestine (CBSP), which also publishes anti-West hate propaganda, and whose website calls for contributions to be sent to a Post Office box in Nancy.

Other European countries also allow HAMAS propaganda websites and fundraising. Sweden, which "supports democratic development in the Palestinian territories," apparently does not see any contradiction in its support of the Malmo-based

### Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 119 of 143 PageID #:

HAMAS front Al-Aqsa Spannmal Stiftelse, which incides contributors to send money to its BankGiro account. The Swiss, who carried several of Arafat's secret bank accounts for decades, and whose foreign minister Micheline Calmy-Rey warmly eulogized Arafat, is also hosting the Association De Secours Palestinien - Suise and the Humanitare Hilfsorganisation Fur Palastina - Schweiz, with a UBS account which in turn transfers the money to HAMAS in the West Bank and Gaza. The Austrian HAMAS front, Palastinensische Ver. In Osterreich, features anti-Israeli propaganda and lists its account for donations in Austria Creditanstalt Bank. And the Italians, who support President Bush's War on Terror, allow HAMAS' Associazione Benefica di Solidarieta con il Popolo Palestinese not only to spread its hateful messages on the their internet providers, but also to collect funds through an account at Banca Nazionale del Lavoro in Genoa, funds which are then sent on to the Palestinian territories.

Equally disturbing is the Europeans' blasé attitude towards the virulently anti-American and anti-Israeli broadcasts of the Iranian-sponsored and controlled TV network, Al-Manar. This Hizbollah mouthpiece spews anti-American incitement and propaganda, which has increased dramatically since the Iraq War. Al-Manar, through its programs, also serves as a fundraising vehicle for both the Islamic Jihad and HAMAS organizations in the Palestinian territories.

The French Eutelsat satellite company, which was formed by the European Space Agency, distributes Al-Manar to Europe and North Africa. The Dutch New Skies Satellites (NSS) company, recently acquired by the American Blackstone Group, distributes Al-Manar to North Africa and parts of Europe. Despite its suffering radical Islamist terror last March, and subsequently arresting many Islamist operatives, Spain allows the Madrid-based Hispasat company to continue broadcasting Al-Manar to South American countries, where the number of Muslim converts is growing exponentially.

What is most surprising, however, is that California-based Telestar, the world's largest global satellite corporation, facilitates the broadcasting of Al-Manar into North America and Canada. It is surprising because the Patriot Act defines the facilitation of communication for terrorist purposes as a terrorist act. Providing satellite broadcasting and internet services to terrorist groups meets that criterion.

As part of the revised agenda for President Bush's second term, Congress should enact legislation requiring American-based satellite and internet service providers to identify and monitor their clients, and the clients of their clients, in order to prevent the facilitation of terrorist communications. This can be done through methods similar to Know Your Customer procedures, which are set in place in financial institutions to follow the money trail. As for foreign satellite and Web-hosting companies, the Office of Foreign Assets Control (OFAC) regulations and the executive orders behind them seem to be a perfect control mechanism.

Rachel Ehrenfeld is author of Funding Evil: How Terrorism is Financed - And How to Stop It; the Director of the New York-based American Center for Democracy; and a member of the Committee on the Present Danger.

----Original Message----

From: HOLT, Amanda, Group Risk Mgmt (nee Turner)

Sent: Friday, December 10, 2004 11:14 AM

To: Smith, Sue (Natwest Risk); Outhwaite, David; FOSTER, Stephen James, Group

Risk Mgmt

Cc: Wilson, Sharon (PA to Graeme Hardie)
Subject: RE: Google Alert - nat-west

David and Sue

Many thanks for this. I can't see the article you are referring to (as I have upgraded to XP to internet no longer works) however, we were aware that we had accounts for people connected to Hamas, but not Hamas itself. I have forwarded this email to Stephen Foster in my team who know the background and who can give the legal/regulatory view from Group.

Regards,

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 120 of 143 PageID #: Amanda Holt 9681

Head of Group Enterprise Risk

Tel no: 020 7334 1148 Fax no: 020 7375 4106 Mobile: 07789 928 481

Internet: amanda.holt@rbos.com

----Original Message----

From: Smith, Sue (Natwest Risk) Sent: 10 December 2004 11:01

To: Outhwaite, David

Cc: Wilson, Sharon (PA to Graeme Hardie); HOLT, Amanda, Group Risk Mgmt (nee

Turner)

Subject: FW: Google Alert - nat-west

Hi David

I've tracked down the accounts - the CIN is 1143476903. They hold 7 accounts with us and the connection is held by CBFM.

Kind Regards

----Original Message----

From: Wilson, Sharon (PA to Graeme Hardie) Sent: Friday, December 10, 2004 10:46 AM

To: Smith, Sue (Natwest Risk)

Subject: FW: Google Alert - nat-west

Sue

Thanks again Sharon

Sharon Wilson
PA to Graeme Hardie
Managing Director, NatWest Retail Banking
2nd Floor West, The Younger Building,
3 Redheughs Avenue, Edinburgh, EH12 9RB
Tel No 0131 523 5130
Mobile No 07774 008084
Fax No 0131 523 6501

DEPOT CODE 045

----Original Message----From: Outhwaite, David

Sent: Friday, December 10, 2004 10:19 AM

To: Hardie, Graeme, NW Retail Executive; HOLT, Amanda, Group Risk Mgmt (nee

Turner)

Subject: FW: Google Alert - nat-west

Amanda - Hope you are well.

Carolyn McAdam suggested that I forward this to you - I'm not exactly sure who in the organisation needs to know about this, but she suggested you might know.

## Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 121 of 143 PageID #:

One of our online news alerts has picked up this article talking about accounts help by Hamas with NatWest. I wouldn't claim to be an expert in the politics in terms of Hamas, although the news website is US based and certainly pro-Israeli.

Any ideas?

Thanks David

David Outhwaite
Head of Retail Media Relations
The Royal Bank of Scotland/NatWest
Tel 020 7672 1915
Mob 07802 972756
david.outhwaite@rbs.co.uk

\_\_\_\_\_

From: Google Alerts [SMTP:googlealerts-noreply@google.com]

Sent: Friday, December 10, 2004 9:41 AM

To: Outhwaite, David

Subject: Google Alert - nat-west

\*\*\* WARNING : This message originates from the Internet \*\*\*

Google Alert for: nat-west

How Terrorist Propaganda Kills
<<http://frontpagemag.com/Articles/ReadArticle.asp?ID=16275>>
Frontpagemag.com - USA

... All the accounts are with Nat West Bank, and the international scope of the organization is evident by dedicated dollar and euro accounts. ...

This as it happens Google Alert is brought to you by Google.

Remove <<http://www.google.com/alerts/remove?s=2acb30c69543b3f7hl=en>> this alert.

Create <<http://www.google.com/alerts?hl=en>> another alert.
Manage <<http://www.google.com/alerts/manage?hl=en>> your alerts.

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Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 122 of 143 PageID #: Whilst all reasonable care has been taken to avogets he transmission of viruses, it is the responsibility of the recipient to ensure that the onward transmission, opening or use of this message and any attachments will not adversely affect its systems or data. No responsibility is accepted by The Royal Bank of Scotland plc in this regard and the recipient should carry out such virus and other checks as it considers appropriate. Visit our websites at: http://www.rbs.co.uk/CBFM http://www.rbsmarkets.com \* \* \* The Royal Bank of Scotland plc. Registered in Scotland No 90312. Registered Office: 36 St Andrew Square, Edinburgh EH2 2YB. Authorised and regulated by the Financial Services Authority This e-mail message is confidential and for use by the addressee only. If the message is received by anyone other than the addressee, please return the message to the sender by replying to it and then delete the message from your computer. Internet e-mails are not necessarily secure. The Royal Bank of Scotland plc does not accept responsibility for changes made to this message after it was sent. Whilst all reasonable care has been taken to avoid the transmission of viruses, it is the responsibility of the recipient to ensure that the onward transmission, opening or use of this message and any attachments will not adversely affect its systems or data. No responsibility is accepted by The Royal Bank of Scotland plc in this regard and the recipient should carry

Visit our websites at:

http://www.rbs.co.uk/CBFM

http://www.rbsmarkets.com

\*

out such virus and other checks as it considers appropriate.

**EXHIBIT 122 to Declaration of Joel Israel** 

### Sheftali, Jackie (Litigation Management)

From:

RODGER, Irvine, CBFM Enterprise Risk

Sent:

13 December 2004 11:49 LOVE, Kevin, CBFM

To: Cc:

COLE, Guy, CBFM Enterprise Risk

Subject:

FW: Google Alert - nat-west

Importance:

#### Kevin

In answer to Amanda's questions

- The rationale for not exiting is that UK law enforcement does not have any concerns with Interpal, the Charities Commission which undertook a thorough review after Interpal was listed by OF AC could find nothing wrong either and the Bank of England has chosen not to follow the US lead. There is a suspicion that the US is being over-zealous in the Middle East (witness Commercial Bank of Syria).
- In light of OFAC, MLPU has undertaken to review all transactions on the accounts on a 6-monthly basis. The next review is imminent.

### Redacted - Privileged

There has been no discussion of this point at CCB or CBFM Board level.

j.

#### Regards

Irvine Rodger CBFM MLPU The Royal Bank of Scotland plc 135 Bishopsgate, London, EC2M 3UR (Depot 028) Tel: (020) 7085 1082

Int: 361082

Fax: (020) 7085 4641

irvine.rodger@rbos.com

----Original Message-----

From: JONES, Richard, CBFM Enterprise Risk

Sent: 13 December 2004 08:48

To: RODGER, Irvine, CBFM Enterprise Risk

Subject: FW: Google Alert - nat-west

Importance: High

Irvine,

Sorry don't know the background on this one....

Richard Jones **CBFM Money Laundering Prevention Unit** 

Tel: 020 7085 6461 Fax: 020 7085 4641

<mailto:richard jones@rbos com>

----Original Message----From: LOVE, Kevin, CBFM Sent: 13 December 2004 08:46

To: JONES, Richard, CBFM Enterprise Risk; COLE, Guy, CBFM Enterprise Risk

Page 1

. 3

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 125 of 143 PageID #: 9686

Subject: FW: Google Alert - nat-west

Importance: High

What is the level of visibility for this relationship within CBFM i.e. does APD know, and approve, of our continued links with the organisation? Please advise ASAP. Thanks and regards Kevin R. Love Global Head of Enterprise Risk Corporate Banking & Financial Markets The Royal Bank of Scotland Group Plc kevin.love@rbos.com

Work: +44 20 7085 4026 Mobile: +44 7769 931630 Pager: +44 7693 308651 Blackberry: +44 7793 858329

----Original Message-----

From: HOLT, Amanda, Group Risk Mgmt (nee Turner)

Sent: 13 December 2004 08:40

To: LOVE, Kevin, CBFM

Subject: Fw: Google Alert - nat-west

Hope this works! Do call to discuss if that helps. Not trying to teach my granny how to suck eggs!

\_\_\_\_

Sent from my BlackBerry Wireless Handheld

----Original Message-----

From: HOLT, Amanda, Group Risk Mgmt (nee Turner) < Amanda. HOLT@rbos.com > To: FOSTER, Stephen James, Group Risk Mgmt < Stephen. J. FOSTER@rbos.com >; LOVE, Kevin, CBFM

MOBILE < Kevin.LOVE.mobile@rbos.com>

Sent: Mon Dec 13 08:31:12 2004 Subject: Re: Google Alert - nat-west

From my perspective, I am re-assured that we are aware of these customers. However, the Group's policy is that we will not have customers on the sanctions & terrorist lists of the Group covering both UK and US terrorist lists. This is not a "Cuba" OFAC issue as this organisation is on the terrorist, rather than general, lists. However, my understanding is that it is not a cut and dry case either due to the different stance towards the Palestinian issue between the US and UK.

I have a few questions that I think need to be resolved at CBFM Board level:

•What is the rationale for not exiting this relationship given there is a match with the Group's lists? •What steps are being taken to manage the situation (e.g. extra monitoring) in the interim whilst this decision is being taken. •What is the regulatory position given our increased presence in the US and the formation of the new US organisation structure. Johnny needs to be aware given his prominant role in this new organisation.

I feel this is urgent, even without the google comment so would appreciate a speedy response and resolution to this.

Obviously, from a Group perspective, we will help in whatever way we can, just let Stephen and I know.

Thanks.

Amanda

--------

Sent from my BlackBerry Wireless Handheld

----Original Message----

Sent: Fri Dec 10 16:20:54 2004

From: FOSTER, Stephen James, Group Risk Mgmt <Stephen.J.FOSTER@rbos.com> To: LOVE, Kevin, CBFM <Kevin.LOVE@rbos.com>; NORRIE, Ben, Group Risk Mgmt

<Ben.NORRIE@rbos.com>; DAVIES, Rob, Group Risk Mgmt <Rob DAVIES@rbos.com>; COLE, Guy, CBFM Enterprise Risk <Guy.COLE@rbos.com>

CC: HOLT, Amanda, Group Risk Mgmt (nee Turner) < Amanda. HOLT@rbos.com>; RODGER, Irvine, CBFM Enterprise Risk < Irvine. Rodger@rbos.com>; KANE, Christine, CBFM < Christine. KANE@rbos.com>

\_ ... Page 2

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 126 of 143 PageID #: 9687

Subject: RE: Google Alert - nat-west

On the review - we'll go back to the e-mail traffic from the time to check. Fears allayed, I think, if all the accounts under the Cin are Interpal.

----Original Message----From: LOVE, Kevin, CBFM Sent: 10 December 2004 16:06

To: FOSTER, Stephen James, Group Risk Mgmt; NORRIE, Ben, Group Risk Mgmt; DAVIES, Rob, Group

Risk Mgmt, COLE, Guy, CBFM Enterprise Risk

Cc: HOLT, Amanda, Group Risk Mgmt (nee Turner); RODGER, Irvine, CBFM Enterprise Risk; KANE,

Christine, CBFM

Subject: RE: Google Alert - nat-west

Importance: High

It's all in the timing isn't it! If I had received Ben's note I am sure we would be doing just as you suggest, reviewing whether we want to stay with this relationship or not; and of course we will now have that debate. I'll get Chris to set something up.

I just want to confirm though, it is the case that our current agreement with you is that whilst we do have the relationship we must review the transactions involved with every six months; which is what we have been doing?

Also, at to my point below, have we allayed your fears that there may have been other accounts of which you were not aware? Thanks Kevin R. Love Global Head of Enterprise Risk Corporate Banking & Financial Markets The Royal Bank of Scotland Group Plc kevin.love@rbos.com

Work: +44 20 7085 4026 Mobile: +44 7769 931630 Pager: +44 7693 308651 Blackberry: +44 7793 858329

----Original Message----

From: FOSTER, Stephen James, Group Risk Mgmt

Sent: 10 December 2004 15:57

To: LOVE, Kevin, CBFM; NORRIE, Ben, Group Risk Mgmt; DAVIES, Rob, Group Risk Mgmt; COLE, Guy,

**CBFM Enterprise Risk** 

Cc: HOLT, Amanda, Group Risk Mgmt (nee Turner); RODGER, Irvine, CBFM Enterprise Risk

Subject: RE: Google Alert - nat-west

We do know the Interpal connection but I had asked Ben earlier this week to draft a note to you asking whether we (RBSG) should maintain this connection given the risks involved.

Following the Charity Commission investigation of Interpal last year, we know there is additional monitoring of account activity but our own recent review of our outstanding S&T issues prompted us to ask whether (primarily from a reputational viewpoint but also a risk of breach of terrorism laws) we want to maintain an account with an organisation cited on the OFAC list as having links to Hamas.

Even allowing for the differences between UK and US approaches to Israel/Palestine issues and the general push back against the extra territoriality of US laws, I suggest that as a group we should look very carefully at such connections before deciding to continue with them. This is doubly important in CBFM where we know that fund raising efforts in the US are coming increasingly under the "OFAC microscope". Happy to discuss.

----Original Message-----

From: LOVE, Kevin, CBFM Sent: 10 December 2004 14:24

To: FOSTER, Stephen James, Group Risk Mgmt; NORRIE, Ben, Group Risk Mgmt; DAVIES, Rob, Group

Risk Mgmt; COLE, Guy, CBFM Enterprise Risk

Cc: HOLT, Amanda, Group Risk Mgmt (nee Turner); RODGER, Irvine, CBFM Enterprise Risk

Subject: RE: Google Alert - nat-west

1

Importance: High

Stephen,

The seven accounts referred to are indeed all connected with Interpal and we were aware of them. I know that you know Interpal well, and presume that this confirmation allays any concerns. If not, please do not hesitate to contact Guy Cole for further information. Regards Kevin R. Love Global Head of Enterprise Risk Corporate

Page 3

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 127 of 143 PageID #: 9688

Banking & Financial Markets The Royal Bank of Scotland Group Plc kevin.love@rbos.com

Work: +44 20 7085 4026 Mobile: +44 7769 931630 Pager: +44 7693 308651 Blackberry: +44 7793 858329

----Original Message----

From: FOSTER, Stephen James, Group Risk Mgmt

Sent: 10 December 2004 11:55

To: NORRIE, Ben, Group Risk Mgmt; DAVIES, Rob, Group Risk Mgmt; LOVE, Kevin, CBFM; COLE, Guy,

**CBFM Enterprise Risk** 

Cc: HOLT, Amanda, Group Risk Mgmt (nee Turner)

Subject: FW: Google Alert - nat-west

FYI - As Amanda says, we were aware of one account with alleged links to Hamas - Interpal - but not that we had actual acounts for Hamas. Is this true? If so, why have they not been picked up by the searches?

----Original Message-----

From: HOLT, Amanda, Group Risk Mgmt (nee Turner)

Sent: 10 December 2004 11:14

To: Smith, Sue (Natwest Risk); Outhwaite, David; FOSTER, Stephen James, Group Risk Mgmt

Cc: Wilson, Sharon (PA to Graeme Hardie)
Subject: RE: Google Alert - nat-west

David and Sue

Many thanks for this. I can't see the article you are referring to (as I have upgraded to XP to internet no longer works) however, we were aware that we had accounts for people connected to Hamas, but not Hamas itself. I have forwarded this email to Stephen Foster in my team who know the background and who can give the legal/regulatory view from Group.

Regards,

Amanda Holt Head of Group Enterprise Risk

Tel no: 020 7334 1148 Fax no: 020 7375 4106 Mobile: 07789 928 481

Internet: amanda.holt@rbos.com

----Original Message-----

From: Smith, Sue (Natwest Risk) Sent: 10 December 2004 11:01

To: Outhwaite, David

Cc: Wilson, Sharon (PA to Graeme Hardie); HOLT, Amanda, Group Risk Mgmt (nee Turner)

Subject: FW: Google Alert - nat-west

Hi David

I've tracked down the accounts - the CIN is 1143476903. They hold 7 accounts with us and the connection is held by CBFM.

Kind Regards

Sue Smith Operational Risk Manager, NatWest Network NatWest Network Risk & Operations NatWest Retail Banking

First Floor West
Younger Building, Edinburgh

Depot Code 045 ' 0131 525 0441 (220441)

\* 0131 550 5682 (205682)

100

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 128 of 143 PageID #: 9689

### \* Sue.Smith@rbs.co.uk

----Original Message-----

From: Wilson, Sharon (PA to Graeme Hardie) Sent: Friday, December 10, 2004 10:46 AM

To: Smith, Sue (Natwest Risk)

Subject: FW: Google Alert - nat-west

Sue

Thanks again Sharon

Sharon Wilson
PA to Graeme Hardie
Managing Director, NatWest Retail Banking
2nd Floor West, The Younger Building,
3 Redheughs Avenue, Edinburgh, EH12 9RB
Tel No 0131 523 5130
Mobile No 07774 008084
Fax No 0131 523 6501

#### **DEPOT CODE 045**

----Original Message-----From: Outhwaite, David

Sent: Friday, December 10, 2004 10:19 AM

To: Hardie, Graeme, NW Retail Executive; HOLT, Amanda, Group Risk Mgmt (nee Turner)

Subject: FW: Google Alert - nat-west

Amanda - Hope you are well.

Carolyn McAdam suggested that I forward this to you - I'm not exactly sure who in the organisation needs to know about this, but she suggested you might know.

One of our online news alerts has picked up this article talking about accounts help by Hamas with NatWest. I wouldn't claim to be an expert in the politics in terms of Hamas, although the news website is US based and certainly pro-Israeli.

Any ideas?

Thanks David

David Outhwaite
Head of Retail Media Relations
The Royal Bank of Scotland/NatWest
Tel 020 7672 1915
Mob 07802 972756
david.outhwaite@rbs.co.uk

\_\_\_\_\_

From: Google Alerts [SMTP:googlealerts-noreply@google.com]

Sent: Friday, December 10, 2004 9:41 AM

Page 5

4, 4

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 129 of 143 PageID #: 9690

To: Outhwaite, David

Subject: Google Alert - nat-west

\*\*\* WARNING: This message originates from the Internet \*\*\*

Google Alert for: nat-west

How Terrorist Propaganda Kills < <a href="http://frontpagemag.com/Articles/ReadArticle.asp?ID=16275">http://frontpagemag.com/Articles/ReadArticle.asp?ID=16275</a>> Frontpagemag.com - USA

... All the accounts are with Nat West Bank, and the international scope of the organization is evident by dedicated dollar and euro accounts. ..

This as it happens Google Alert is brought to you by Google.

Remove <<u>http://www.google.com/alerts/remove?s=2acb30c69543b3f7&hl=en</u>> this alert. Create <<u>http://www.google.com/alerts?hl=en</u>> another alert. Manage <<u>http://www.google.com/alerts/manage?hl=en</u>> your alerts.

4

**EXHIBIT 123 to Declaration of Joel Israel** 

### Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 131 of 143 PageID #:

HOLT, Amanda, Group Risk Mgmt (nee Turner) 9692

From: Outhwaite, David

Sent: Friday, December 10, 2004 06:23 AM

To: HOLT, Amanda, Group Risk Mgmt (nee Turner)

Subject: RE: Google Alert - nat-west

Attachments: Untitled Attachment1

Amanda this is the article.

David

How Terrorist Propaganda Kills

By Rachel Ehrenfeld <authors.asp?ID=579> FrontPageMagazine.com | December 10, 2004 Tony Blair and the Europeans are focusing their attention on the creation of a Palestinian state as the magic formula for peace in the Middle East. At the same time, they are turning a blind eye to the growing propaganda and fundraising campaign on websites and TV stations in their own countries.

The Europeans' behavior is not surprising. Their top foreign policy official, Javier Solana, the EU High Representative for Foreign and Security Policy, expressed a "deep sadness" over the death of Yasser Arafat, the failed Palestinian leader who initiated the culture of death and destruction. Solana further suggested that the best way to commemorate him is to follow in his footsteps. In fact, he outdid Arafat by negotiating with HAMAS, which the EU itself has designated as a terrorist organization.

The most active HAMAS front organization worldwide is the London-based Interpal, which publishes anti-American and anti-Israeli propaganda, and which in 2003 alone sent more than \$20 million to different HAMAS organizations in the Palestinian territories. In addition to fundraising in England in Pounds Sterling, Interpal lists on its website four different bank accounts to which contributors can send money. All the accounts are with Nat West Bank, and the international scope of the organization is evident by dedicated dollar and euro accounts.

And England is not alone. While the French Prime Minister Jean-Pierre Raffarin is calling to shut down Al-Manar, Hizbollah's TV broascasting in France, his country continues to host the Paris-based HAMAS front organization, Votre Partenaire Humanitaire en Palestine (CBSP), which also publishes anti-West hate propaganda, and whose website calls for contributions to be sent to a Post Office box in Nancy.

Other European countries also allow HAMAS propaganda websites and fundraising. Sweden, which "supports democratic development in the Palestinian territories," apparently does not see any contradiction in its support of the Malmo-based HAMAS front Al-Aqsa Spannmal Stiftelse, which invites contributors to send money to its BankGiro account. The Swiss, who carried several of Arafat's secret bank accounts for decades, and whose foreign minister Micheline Calmy-Rey warmly eulogized Arafat, is also hosting the Association De Secours Palestinien - Suise and the Humanitare Hilfsorganisation Fur Palastina - Schweiz, with a UBS account which in turn transfers the money to HAMAS in the West Bank and Gaza. The Austrian HAMAS front, Palastinensische Ver. In Osterreich, features anti-Israeli propaganda and lists its account for donations in Austria Creditanstalt Bank. And the Italians, who support President Bush's War on Terror, allow HAMAS' Associazione Benefica di Solidarieta con il Popolo Palestinese not only to spread its hateful messages on the their internet providers, but also to collect funds through an account at Banca Nazionale del Lavoro in Genoa, funds which are then sent on to the Palestinian territories.

Equally disturbing is the Europeans' blasé attitude towards the virulently anti-American and anti-Israeli broadcasts of the Iranian-sponsored and controlled TV network, Al-Manar. This Hizbollah mouthpiece spews anti-American

Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 132 of 143 PageID #: incitement and propaganda, which has increased open tically since the Iraq War.

Al-Manar, through its programs, also serves as a fundraising vehicle for both the Islamic Jihad and HAMAS organizations in the Palestinian territories.

The French Eutelsat satellite company, which was formed by the European Space Agency, distributes Al-Manar to Europe and North Africa. The Dutch New Skies Satellites (NSS) company, recently acquired by the American Blackstone Group, distributes Al-Manar to North Africa and parts of Europe. Despite its suffering radical Islamist terror last March, and subsequently arresting many Islamist operatives, Spain allows the Madrid-based Hispasat company to continue broadcasting Al-Manar to South American countries, where the number of Muslim converts is growing exponentially.

What is most surprising, however, is that California-based Telestar, the world's largest global satellite corporation, facilitates the broadcasting of Al-Manar into North America and Canada. It is surprising because the Patriot Act defines the facilitation of communication for terrorist purposes as a terrorist act. Providing satellite broadcasting and internet services to terrorist groups meets that criterion.

As part of the revised agenda for President Bush's second term, Congress should enact legislation requiring American-based satellite and internet service providers to identify and monitor their clients, and the clients of their clients, in order to prevent the facilitation of terrorist communications. This can be done through methods similar to Know Your Customer procedures, which are set in place in financial institutions to follow the money trail. As for foreign satellite and Web-hosting companies, the Office of Foreign Assets Control (OFAC) regulations and the executive orders behind them seem to be a perfect control mechanism.

Rachel Ehrenfeld is author of Funding Evil: How Terrorism is Financed - And How to Stop It; the Director of the New York-based American Center for Democracy; and a member of the Committee on the Present Danger.

----Original Message----

From: HOLT, Amanda, Group Risk Mgmt (nee Turner)

Sent: Friday, December 10, 2004 11:14 AM

To: Smith, Sue (Natwest Risk); Outhwaite, David; FOSTER, Stephen James, Group

Risk Mgmt

Cc: Wilson, Sharon (PA to Graeme Hardie)

Subject: RE: Google Alert - nat-west

David and Sue

Many thanks for this. I can't see the article you are referring to (as I have upgraded to XP to internet no longer works) however, we were aware that we had accounts for people connected to Hamas, but not Hamas itself. I have forwarded this email to Stephen Foster in my team who know the background and who can give the legal/regulatory view from Group.

Regards,

Amanda Holt

Head of Group Enterprise Risk

Tel no: 020 7334 1148 Fax no: 020 7375 4106 Mobile: 07789 928 481

Internet: amanda.holt@rbos.com

----Original Message----

From: Smith, Sue (Natwest Risk) Sent: 10 December 2004 11:01

To: Outhwaite, David

Cc: Wilson, Sharon (PA to Graeme Hardie); HOLT, Amanda, Group Risk Mgmt (nee

Turner)

Subject: FW: Google Alert - nat-west

### Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 133 of 143 PageID #: Hi David

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with us and the connection is held by CBFM.
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Kind Regards

Sue Smith Operational Risk Manager, NatWest Network NatWest Network Risk \_Operations NatWest Retail Banking First Floor West Younger Building, Edinburgh Depot Code 045 0131 525 0441 (220441)0131 550 5682 (205682) \* Sue.Smith@rbs.co.uk ----Original Message----

From: Wilson, Sharon (PA to Graeme Hardie) Friday, December 10, 2004 10:46 AM

To: Smith, Sue (Natwest Risk)

Subject: FW: Google Alert - nat-west

Sue

Thanks again Sharon

Sharon Wilson PA to Graeme Hardie Managing Director, NatWest Retail Banking 2nd Floor West, The Younger Building, 3 Redheughs Avenue, Edinburgh, EH12 9RB Tel No 0131 523 5130 Mobile No 07774 008084 Fax No 0131 523 6501

DEPOT CODE 045

----Original Message----Outhwaite, David

Friday, December 10, 2004 10:19 AM

Hardie, Graeme, NW Retail Executive; HOLT, Amanda, Group Risk Mgmt (nee To:

Turner)

Subject: FW: Google Alert - nat-west

Amanda - Hope you are well.

Carolyn McAdam suggested that I forward this to you - I'm not exactly sure who in the organisation needs to know about this, but she suggested you might know.

One of our online news alerts has picked up this article talking about accounts help by Hamas with NatWest. I wouldn't claim to be an expert in the politics in terms of Hamas, although the news website is US based and certainly pro-Israeli.

Any ideas?

Thanks David

David Outhwaite Head of Retail Media Relations The Royal Bank of Scotland/NatWest Tel 020 7672 1915 Mob 07802 972756 david.outhwaite@rbs.co.uk

```
Google Alerts [SMTP:googlealerts-noreply@google.com]
From:
Sent:
         Friday, December 10, 2004 9:41 AM
To:
       Outhwaite, David
Subject:
            Google Alert - nat-west
*** WARNING: This message originates from the Internet ***
Google Alert for: nat-west
How Terrorist Propaganda Kills
<<a href="http://frontpagemag.com/Articles/ReadArticle.asp?ID=16275">>> <<a href="http://frontpagemag.com/Articles/ReadArticle.asp?ID=16275">>> < < http://frontpagemag.com/Articles/ReadArticle.asp?ID=16275</a>>
Frontpagemag.com - USA
... All the accounts are with Nat West Bank, and the international scope of the
organization is evident by dedicated dollar and euro accounts. ...
 This as it happens Google Alert is brought to you by Google.
Remove <<http://www.google.com/alerts/remove?s=2acb30c69543b3f7hl=en>> this
alert.
Create <<http://www.google.com/alerts?hl=en>> another alert.
Manage <<http://www.google.com/alerts/manage?hl=en>> your alerts.
******************************
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out such virus and other checks as it considers appropriate.
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Visit our websites at:

http://www.rbs.co.uk/CBFM

http://www.rbsmarkets.com

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## **EXHIBIT 124 to Declaration of Joel Israel**

### Garrett, Steve (Comm Bkng EW)

From:

RODGER, Irvine, CBFM Enterprise Risk

Sent:

15 December 2004 12:06

To:

LOVE, Kevin, CBFM

Cc:

Lewis, Jill; Garrett, Steve (Comm Bkng E&V/); Wyles, Graeme; Dickinson, Alan (CB

London); Weir, Derek; COLE, Guy, CBFM Enterprise Risk

Subject:

RE: Commercial Relationship - Interpal

#### Kevin

There are more matches than expected so Guy needs to spend time discounting them. However, there have been no matches so far (two-thirds have been done). By close of play today, he will have completed this. To do a full and proper job, Guy will a = 0 consider reputational issues with some of the recipients. As you can imagine, Israel suspect all Palestinian charities regardless. He estimates that the reputational review will be complete by tomorrow lanchtime.

Apologies that this is taking longer than expected but in the circumstances of Amanda Holt's request, it is best that we can confirm with a high degree of certainty that the charity is clean.

### Regards

### Irvine Rodger

**CBFM MLPU** 

The Royal Bank of Scotland plc

135 Bishopsgate, London, EC2M 3UR (Depot 028)

Tel: (020) 7085 1082 Int: 361082

Fax: (020) 7085 4641

irvine.rodger@rbos.com <mailto:irvine.rodger@rbos.com>

----Original Message----

From:

LOVE, Kevin, CBFM 15 December 2004 11:49

Sent: To:

RODGER, Irvine, CBFM Enterprise Risk

Lewis, Jill; Garrett, Steve (Comm Bkng E&W); Wyles, Graeme; Dickingon, Alan (CB London); Weir, Derek; COLE, Guy, CBFM Enterprise Risk

RE: Commercial Relationship - Interpal

Subject: Importance: High

What is the result of this: "All payments out will be matched against the Bank of England sanctions and terrorist list this afternoon"

Thanks

Kevin R. Love

Global Head of Enterprise Risk

Corporate Banking & Financial Markets

The Royal Bank of Scotland Group Pic

kevin.love@rbos.com

Work: +44 20 7085 4026 Mobile: +44 7769 931630 Pager: +44 7693 308651 Blackberry: +44 7793 858329

----Original Message----

From: RODGER, Irvine, CBFM Enterprise Risk

Sent: 14 December 2004 12:38

To: Wyles, Graeme; Dickinson, Alan (CB London); Weir, Derek; LOVE, Kevin, CBFM; COLE, Guy, CBFM

Enterprise Risk

Cc: Lewis, Jill; Garrett, Steve (Comm Bkng E&W) Subject: RE: Commercial Relationship - Interpal

*#* ,

2 j.

I understand Graeme.

Guy can confirm that all receipts in are via direct debit. All payments out will be matched against the Bank of England sanctions and terrorist list this afternoon.

I feel that the note I wrote for Kevin was confusing as I had included a double negative. For the avoidance of doubt, Guy and I believe the account should remain open.

#### Regards

### Irvine Rodger

CBFM MLPU
The Royal Bank of Scotland plc
135 Bishopsgate, London, EC2M 3UR (Depot 028)
Tel: (020) 7085 1082
Int: 361082
Fax: (020) 7085 4641

e: <u>irvine.rodger@rbos.com <mailto:irvine.rodger@rbos.com></u>

-----Original Message-----

From: Wyles, Graeme

Sent: 14 December 2004 12:26

To: Dickinson, Alan (CB London); RODGER, Irvine, CBFM Enterprise Risk; Weir, Derek; LOVE, Kevin, CBFM

Cc: Lewis, Jill; Garrett, Steve (Comm Bkng E&W)

Subject: RE: Commercial Relationship - Interpal

#### Gents

I will pick this one up to make sure that going forward tight overview in place re monies in/out.We will report any suspicious activity. I'd like to defer any debate over exit for the time being. We have more than sufficient "clear cut" exits underway / in course without adding a potential "high profile" situation where at this time no "malpractice" is proven or indeed actually evident.

Should it be necessary to report any activity you have my assurance that exit will be considered at that time.

Steve Garrett

Talk tomorrow please.

Graeme

Graeme Wyles Director Risk Commercial Banking , UK 020 7672 0194 Mobile: 07887 898668 Pager 07693 266560 Depot 028

-----Original Message-----

From: Dickinson, Alan (CB London)
Sent: 13 December 2004 17:02

To: RODGER, Irvine, CBFM Enterprise Risk; Weir, Derek; LOVE, Kevin, CBFM

Cc: Lewis, Jill; Wyles, Graeme

Subject: RE: Commercial Relationship - Interpal

Pls make sure that the outcome is elevated to Derek and myself..

#### Alan

----Original Message-----

From: RODGER, Irvine, CBFM Enterprise Risk Sent: Monday, December 13, 2004 4:12 PM

To: Dickinson, Alan (CB London); Weir, Derek; LOVE, Kevin, CBFM

Cc: Lewis, Jill; Wyles, Graeme

Subject: RE: Commercial Relationship - Interpal

#### Alan

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 139 of 143 PageID #: 9700

The money coming in is comprised of a variety of donations of varying sizes and the amounts go out to the Occupied Territories. Following the temporary freezing of the accounts earlier this year for investigation purposes, Guy Cole from my team reviews all movements on the accounts on a 6-monthly basis (in light of OFAC sanctions).. The next 6-monthly review is imminently due.

### Regards

### Irvine Rodger

CBFM MLPU
The Royal Bank of Scotland plc
135 Bishopsgate, London, EC2M 3UR (Depot 028)
Tel: (020) 7085 1082

Int: 361082 Fax: (020) 7085 4641

e: irvine.rodger@rbos.com <<mailto:irvine.rodger@rbos.com>>

-----Original Message-----

From: Dickinson, Alan (CB London)
Sent: 13 December 2004 16:03
To: Weir, Derek; LOVE, Kevin, CBFM

Cc: Lewis, Jill; Wyles, Graeme; RODGER, Irvine, CBFM Enterprise Risk

Subject: RE: Commercial Relationship - Interpal

what does the activity on the account (in and out) teli us?

Α

----Original Message-----

From: Weir, Denek

Sent: Monday, December 13, 2004 3.58 PM

To: LOVE, Kevin, CBFM; Dickinson, Alan (CB London)
Cc: Lewis, Jill; Wyles, Graeme; RODGER, irvine, CBFM Enterprise Risk

Subject: RE Commercial Relationship - Interpal

Damned if you do and damned if you don't I guess. There must be lots of entities around the world raising money for Palestinian causes, given what's going on there. I don't think we can be influenced by that particular internet article, which is biased to say the least.

This account has been under scrutiny for years and the transactions are fairly transparent. The issue must be who is giving it the money in the first place to send to Palestine. Don't know how closely we can monitor that.

I don't think we can close the account unless we have some proof of the accusations. Closing the account would imply we believed they were funding terrorists, which would not be a good place to be.

#### Derek

----Original Message----

From: LOVE, Kevin, CBFM

Sent: Monday, December 13, 2004 3.36 PM
To: Dickinson, Alan (CB London), Weli, Derek

Cc: Lewis, Jill; Wyles, Graeme; RODGER, Irvine, CBFM Enterprise Risk

Subject: Commercial Relationship - Interpal

Importance: High

#### Alan/Derek,

Following a news item found on Google (link attached together with relevant paragraph) Group Enterprise Risk (GER) have asked further questions relating to the accounts we manage on behalf of Interpal, a British Charity. GER were aware that we have a relationship with Interpal but felt we should revisit this.

"Google Alert for: nat-west

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 140 of 143 PageID #:

How Terrorist Propaganda Kills <<u><<<http://frontpagemag.com/Articles/ReadArticle.asp?ID=16275</u> >>>>

Frontpagemag.com - USA

... All the accounts are with **Nat West** Bank, and the international scope of the organization is evident by dedicated dollar and euro accounts ..."

"The most active HAMAS front organization worldwide is the London-based Interpal, which publishes anti-American and anti-Israeli propaganda, and which in 2003 alone sent more than \$20 million to different HAMAS organizations in the Palestinian territories. In addition to fundraising in England in Pounds Sterling, Interpal lists on its website four different bank accounts to which contributors can send money. All the accounts are with Nat West Bank, and the international scope of the organization is evident by dedicated dollar and euro accounts."

Amanda Holt has commented that the Group's policy is that we will not have customers on the sanctions & terrorist lists of the Group covering both UK and US terrorist lists. Further, she does not see this as a "Cuba" OFAC issue as Interpal are on the terrorist, rather than general, lists. Amanda also recognises, however, that it is not a cut and dry case either due to the different stance towards the Palestinian issue between the US and UK.

Amanda's specific questions are as follows:

•What steps are being taken to manage the situation (e.g. extra monitoring)? I can confirm that, as previously agreed with GER, we do extend additional monitoring to this account.

•What is the regulatory position given our increased presence in the US and the formation of the new US organisation structure? Should we decide to stay with this relationship, we will need to investigate this more fully

In addition, especially if we chose to maintain this relationship, Amanda felt that Johnny should be made aware given his "prominent role in this new organisation".

Irvine's note below provides more detail on Interpal themselves and the feelings of the RM. I should draw your attention to the potential reputational risk associated with exit. If we decide to remain in the relationship, we will need to appraise Johnny. Their site carries the following current news bulletin:

"The Board of Trustees, staff and supporters of INTERPAL are "delighted" that the Charity Commission has rejected American accusations and "evidence" that the charity has links to illegal activities in the Middle East and has as a result ended its inquiry into the charity"s affairs..."

Please can I have your thoughts on the matter?
Thanks and regards
Kevin R. Love
Global Head of Enterprise Risk
Corporate Banking & Financial Markets
The Royal Bank of Scotland Group Plc
kevin.love@rbos.com
Work: +44 20 7085 4026 Mobile: +44 7769 931630

Work: +44 20 7085 4026 Mobile: +44 7769 931630 Pager: +44 7693 308651 Blackberry: +44 7793 858329

#### Kevin

The RM is Belinda Lane from Romford Commercial (01708 774529). She is not concerned about the account holders. She re-iterated that the account has been investigated many times without anything untoward coming to light. However one irritation is developing - increasing difficulties in making payments to Palestine because local banks there will not accept them (due to OFAC). Consequently, although the account is quite a big income earner for her (£50,000), it

ð.

is becoming higher maintenance.

Taking everything into account, Belinda would accept the loss of this customer even though it has done nothing wrong provided her target can be adjusted accordingly. She did point out that the charity would find it difficult to rebank due to OFAC and the background to RBS kicking it out. There is consequently a danger of adverse media comment if we were to close a legitimate charitable account.

I have pasted in the charity's Internet blurb <<www.interpal.org>> <<<hr/><</td><</td>

By way of background, there were investigations by the Charities Commission and Special Branch into potential links with Hamas, but no action was taken against the charity. The Bank of England has also confirmed that although the Terrorism Order 2001 does cover Hamas, it does not cover Interpal.

Guy has not found anything that substantiates beyond opinion that Interpal has made payments to terrorist groups. It appears the perspective taken by Israel towards Interpal and other charities operating/funding schools/orphanages/hostels in Palestine and Gaza, is that these charities perpetuate terrorism as terrorists know that if they die their dependants will be looked after by the charities. Interpal is a predominant UK charity providing relief in this region, it hosted and funded a visit by British MPs to the region in 1998.

Taking everything into account, neither myself nor Guy think that the accounts should not be closed. However, you may wish to get Derek and Alan to make the final decision.

### Regards

- INTERPAL is a non-political, non-profit making British charity that focuses solely on the provision of relief and development aid to the poor and needy of Palestine.
- INTERPAL's area of operation is mainly Gaza, the West Bank and the refugee camps in Jordan and Lebanon. We work with in excess of 150 different charitable organizations in these areas, all of whom are registered with the appropriate local authorities.
- INTERPAL's stated official policy is to coordinate with charities both in Britain and abroad in order to further its aims and objectives to provide relief and development aid to the people of Palestine. This is to increase efficiency and avoid duplication ensuring maximum benefit for Palestine's poor and needy.
- INTERPAL's commitment to Public Accountability and Transparency means that it only deals with bona fide organisations, not individuals, which are duly registered by the appropriate local authorities. Its work with these organizations is subject to a strict Funding Agreement to ensure the proper charitable use of funds as specified.
- INTERPAL sends delegations made up of community leaders to our areas of operation as part of our awareness raising effort. These leaders then report back to the community, to give a first hand account of the situation of poor and needy Palestinians as well as the progress of INTERPAL projects. INTERPAL is committed to transparency in its operations, and this is one way of ensuring that interested parties can see for themselves exactly how their money has been spent.
- Like all charities registered in England, INTERPAL is governed by English Law, and the rules, regulations and guidelines determined by the Charity Commission, the governmental body that monitors charities' activities. The Inland Revenue also periodically sends its officers to scrutinise our audited accounts
- INTERPAL was established to provide humanitarian and development aid

# Case 1:05-cv-04622-DLI-RML Document 272-6 Filed 03/22/12 Page 142 of 143 PageID #: 9703

in an area where there is great need. We are committed to carrying out the wishes of our donors and bound by a religious duty and moral obligation to ensure that the funds are used for charitable purposes as specified. We are also under a legal duty to operate within the laws of the United Kingdom and the areas in which we operate. It is not in our interest or the interest of our ultimate beneficiaries to exceed the remit of our Trust Deed and operate outside the law.

• In order to ensure that the funds it transfers are used as directed, INTERPAL maintains a very strict audit trail and insists on a formal contractual relationship with all our partners. We require our partners to sign and adhere strictly to a Funding Agreement. All transfers of funds are properly authorised, documented and receipted, and local partners are under a duty to provide progress reports and a final report of the projects they implement on our behalf. These reports are supported by relevant documents (e.g. receipts of purchases and distribution of funds) and photographic or video records.

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